



**U.S. Environmental Protection Agency**  
Office of Waste Programs Enforcement  
Contract No. 68-W9-0009

# **TES 12**

**Technical Enforcement Support  
at Hazardous Waste Sites  
Zone IV  
Regions 8, 9, and 10**



**PRC Environmental Management, Inc.**

**DOUGLAS AIRCRAFT COMPANY  
LONG BEACH, CALIFORNIA**

**RCRA COMPLIANCE EVALUATION INSPECTION**

**REPORT**

**Prepared For**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, D.C. 20460**

<b>Work Assignment No.</b>	<b>:</b>	<b>R09020</b>
<b>EPA Region</b>	<b>:</b>	<b>9</b>
<b>Site No.</b>	<b>:</b>	<b>CAD008378044</b>
<b>Date Prepared</b>	<b>:</b>	<b>October 1, 1990</b>
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**RCRA INSPECTION REPORT**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9**  
**HAZARDOUS WASTE MANAGEMENT DIVISION**  
**WASTE COMPLIANCE BRANCH**

Purpose : RCRA Compliance Evaluation Inspection

Facility : Douglas Aircraft Company  
Long Beach, California

Facility Address : 3855 Lakewood Boulevard  
Long Beach, California 90846

Facility EPA ID Number : CAD008378044

Date of Inspection : August 21, 1990

EPA Representatives : Barbara Sootkoos, Environmental Engineer  
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415/543-4880

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PRC Environmental Management, Inc.  
415/543-4880


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Report Prepared By : Barbara Sootkoos

Report Date : October 1, 1990

  
\_\_\_\_\_  
Barbara Sootkoos  
Project Manager

10-1-90  
\_\_\_\_\_  
Date Approved

## TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION .....	1
2.0 FACILITY BACKGROUND .....	1
2.1 FACILITY DESCRIPTION .....	1
2.2 REGULATORY STATUS .....	2
2.3 HAZARDOUS WASTE ACTIVITY .....	2
3.0 INSPECTION OBSERVATIONS .....	4
3.1 FIELD INSPECTION .....	4
3.1.1 Buildings 3, 4, 5, and 6 .....	5
3.1.2 Building 47 .....	7
3.1.3 Buildings 85 and 87 .....	11
3.2 DOCUMENT REVIEW .....	12
3.2.1 Biennial Reports .....	12
3.2.2 Contingency Plan .....	12
3.2.3 Manifests .....	12
3.3 STATUS OF PREVIOUS VIOLATIONS .....	13
3.4 DISCUSSION WITH FACILITY MANAGEMENT .....	13
4.0 POTENTIAL VIOLATIONS .....	14

### Appendix

A	CEI CHECKLIST
B	NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM
C	INSPECTION PHOTOGRAPHS
D	FLUORESCENT PENETRANT MSDS
E	TANK INSTALLATION REPORT

## LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
1	SITE MAP .....	3

## **1.0 INTRODUCTION**

PRC Environmental Management, Inc., (PRC) received Work Assignment No. R09020 from the U.S. Environmental Protection Agency, Region 9 (EPA) under Contract No. 68-W9-0009 (TES 12). This work assignment calls for PRC to support EPA's enforcement of the Resource Conservation and Recovery Act (RCRA) by conducting compliance evaluation inspections (CEI) at hazardous waste generator facilities in Southern California. Each CEI involves reviewing relevant facility information, performing a site inspection, preparing an inspection report, and conducting informal enforcement.

Following a review of facility information, PRC performed a CEI on August 21, 1990, at Douglas Aircraft Company (Douglas Aircraft), located in Long Beach, California. The CEI consisted of a facility walk-through and a review of applicable hazardous waste management documents. The CEI evaluated the facility's compliance with applicable Federal regulations specified in 40 CFR Parts 260 through 270, which regulate generators of hazardous waste. The evaluation included completing a checklist developed by EPA specifically for hazardous waste generator CEIs (Appendix A). This report summarizes the results of the CEI. Supporting documentation is provided in the appendices listed below:

- Appendix A: CEI Checklist
- Appendix B: Notification of Hazardous Waste Activity Form
- Appendix C: Inspection Photographs
- Appendix D: Fluorescent Penetrant MSDS
- Appendix E: Tank Installation Report

## **2.0 FACILITY BACKGROUND**

The following sections describe the facility, its regulatory status, and its hazardous waste activities.

### **2.1 FACILITY DESCRIPTION**

Douglas Aircraft is located at 3855 Lakewood Boulevard, in an industrial area of Long Beach, California, near the Long Beach Municipal Airport. The main facility (EPA Identification No. CAD008378044) covers approximately 450 acres, the majority of which is

located west of Lakewood Boulevard; however, a portion of the main facility extends to the east of Lakewood Boulevard (Figure 1). The entrances to the east and west portions of the main facility face each other along Lakewood Boulevard. Douglas Aircraft also constructed a tunnel underneath Lakewood Boulevard that connects the east and west portions of the main facility.

The main facility houses numerous buildings and hangars used for administration and a variety of aircraft manufacturing, testing, and maintenance activities. Two waste water treatment plants exist on-site. In addition, Douglas Aircraft maintains its own fire department and medical facility on-site. Approximately 45,000 people are employed at the facility, which operates 7 days a week, three shifts a day.

Douglas Aircraft operates another facility in the area that is located across the Long Beach Municipal Airport to the west. The Douglas Aircraft West Airport Facility is not considered part of the main facility and, according to facility representatives, has its own EPA Identification Number in accordance with RCRA requirements. The West Airport Facility was not addressed by this CEI.

## **2.2 REGULATORY STATUS**

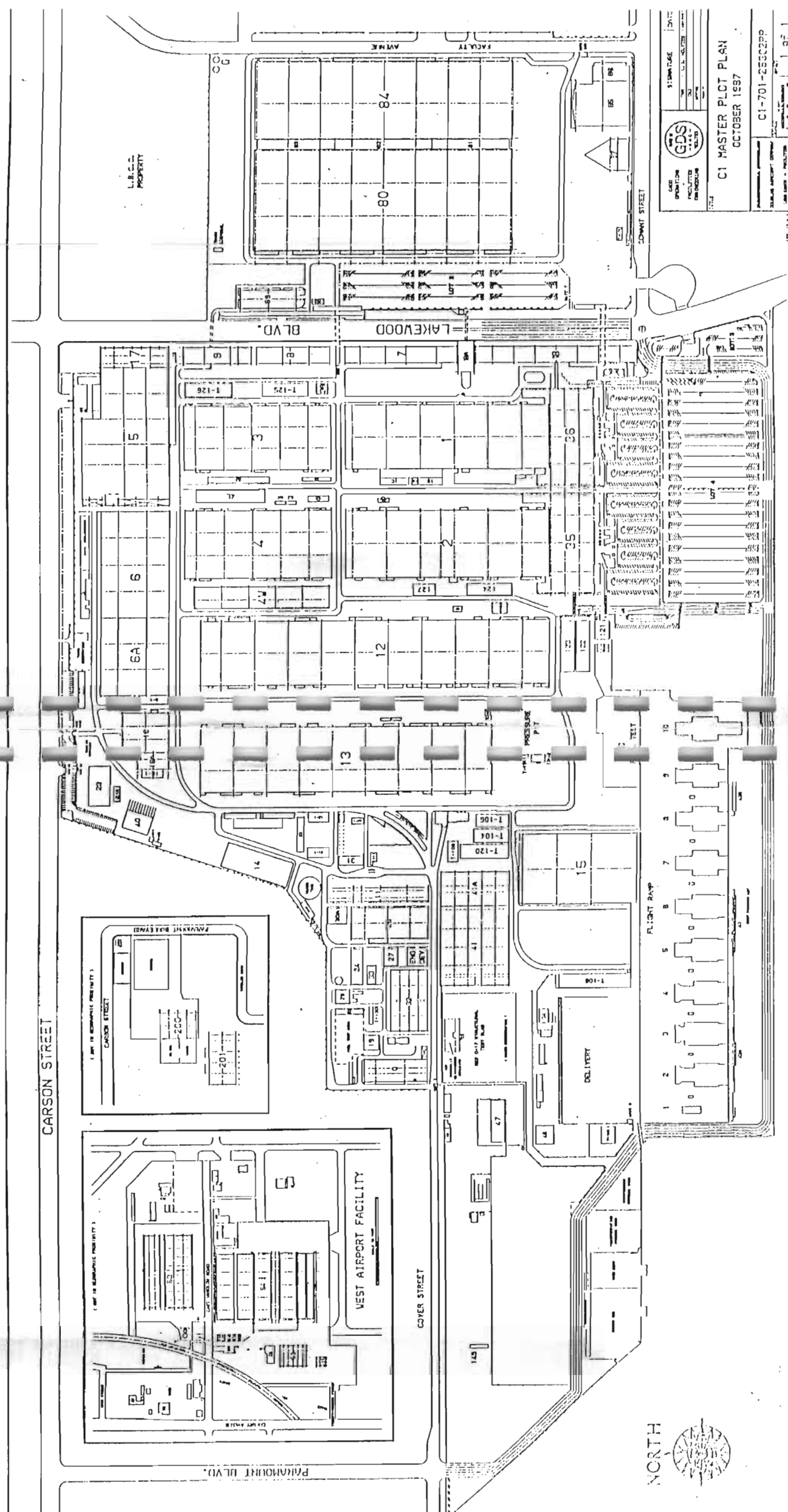
On June 27, 1980, Douglas Aircraft submitted a Notification of Hazardous Waste Activity form (Notification) indicating it was a hazardous waste generator (Appendix B). According to facility representatives, Douglas Aircraft is still only a generator of hazardous wastes and has never treated, stored, or disposed of hazardous wastes on-site.

According to facility representatives, the main facility has three outfalls on-site where water is discharged from the facility in accordance with requirements stated in Douglas Aircraft's National Pollutant Discharge Elimination System (NPDES) permits.

## **2.3 HAZARDOUS WASTE ACTIVITY**

As noted in Douglas Aircraft's 1980 Notification, the facility has the potential to generate a wide variety of hazardous wastes in various quantities, depending on the types of activities conducted at the facility. According to the Notification, these hazardous wastes include numerous acids, caustics, cyanides, organics, miscellaneous salts, and solvents. In addition, inspectors noted that the facility currently produces metal-contaminated hazardous wastes. Douglas Aircraft also generates several non-RCRA regulated wastes, including asbestos and oil wastes.





There are numerous hazardous waste generation points on-site. In general, each generation point (or shop) is responsible for managing its hazardous wastes until the drum or container accumulating these wastes is full. Once full, the drums or containers are picked up and transported to the hazardous waste accumulation area located in the western portion of the facility at Building 47. According to facility representatives, there are two employees dedicated to picking up hazardous wastes from generation points and transporting them to the accumulation area.

IT Corporation, a contractor to Douglas Aircraft, manages the hazardous waste accumulation area. IT Corporation repackages hazardous wastes in this area, if needed, and arranges for their transport off-site for treatment or disposal.

### 3.0 INSPECTION OBSERVATIONS

Barbara Sootkoos (lead inspector) and Gordon Ballentine of PRC conducted the RCRA CEI at Douglas Aircraft on August 21, 1990. The facility representatives during the inspection were Dave Ganoung, Group Leader of Environmental Compliance Plant Services; Robert Tomko, Senior Environmental Engineer; and Ron Fornator, Environmental Engineer. Photographs taken by the inspectors are located in Appendix C. The CEI included both a field inspection and document review, as described in the following sections.

#### 3.1 FIELD INSPECTION

Inspectors targeted the following hazardous waste generation areas at Douglas Aircraft for inspection:

<u>Building Number</u>	<u>Location</u>	<u>Hazardous Waste Activities</u>
3	West of Lakewood Blvd.	Metal finishing
4	West of Lakewood Blvd.	Degreasing, small parts painting,
5	West of Lakewood Blvd.	Metal finishing
6	West of Lakewood Blvd.	Degreasing, painting
47	West of Lakewood Blvd.	Hazardous waste accumulation
85	East of Lakewood Blvd.	Painting
87	East of Lakewood Blvd.	Painting

Observations made during the inspection are described in the following subsections.

### **3.1.1 Buildings 3, 4, 5, and 6**

Buildings 3, 4, 5, and 6 are located adjacent to each other in the northern portion of the facility, just west of Lakewood Boulevard. The hazardous wastes generated in these buildings are primarily from degreasing, metal finishing, and painting operations. A description of these and other activities noted during the inspection are described below.

#### **3.1.1.1 Degreasing**

Degreasing operations occur in Buildings 4 and 6. One degreaser is located in Building 4 and two degreasers are located in Building 6. Each degreaser has a still attached to it which recycles the solvent (1,1,1-trichloroethane) in a closed-loop system. No potential violations were noted in the degreasing areas.

#### **3.1.1.2 Metal Finishing**

Metal finishing operations occur in Buildings 3 and 5. According to facility representatives, the plating shop in Building 3, which was not inspected during the CEI, uses cadmium and cyanide. There are two plating shops in the bi-level Building 5: the "old" plating shop is located on the bottom floor and the "new" plating shop is located on the top floor. Facility representatives indicated the new plating shop would replace the old plating shop in the future. Both the new and old plating shops in Building 5 are currently in operation and were inspected.

The metal finishing processes (conversion coating of aluminum) for the old and new plating shops are similar. The new plating shop has two lines with a total of 11 tanks, or "baths". Each bath is approximately 115 feet long and contains 80,000 gallons. The first line consists of the following baths in series: alkaline rinse, rinse, tri-acid (nitric-chromic-hydrofluoric) etch, chromic acid (anodizer), hot deionized (DI) water (anodic seal), and chromic acid (used if the aluminum is not anodized). The second line consists of the following baths in series: rinse, desmut (deoxidizer), sodium hydroxide-based etch, rinse, and sodium hydroxide-based etch.

The rinse baths for the old and new plating lines are routed to one of the waste water treatment plants (WWTP) on-site for treatment. According to facility representatives, some of the baths are regenerated and have never been emptied. Baths that cannot be regenerated are

emptied as needed and disposed of off-site. No potential violations were noted in the metal finishing areas.

#### **3.1.1.3 Painting**

Painting operations occur in Buildings 4 and 6. According to facility representatives, all painting booths at Douglas Aircraft are permitted by the local Air Quality Management District. Near the individual work stations in the painting areas, inspectors noted several 5-gallon metal containers painted red that are used to accumulate solvent-contaminated rags. These containers were covered and labeled as "soiled rags."

In addition, inspectors noted several satellite accumulation areas in these buildings for 55-gallon drums of solvent and paint wastes. In one of these satellite accumulation areas, inspectors noted a full, 55-gallon drum of waste solvent/paint with an accumulation date of August 20, 1990. According to facility representatives, the shop managers mark the accumulation date on drums when the first "drop of waste" is put into the drum, rather than when the drum is full. The facility representatives stated that they require this restrictive practice to better manage the shop wastes, and that their 90-day accumulation limit is not affected by more than 2 or 3 days since these drums are filled quickly. Facility representatives stated that when drums are full, they are picked up and transported to the hazardous waste accumulation area within 3 days.

No potential violations were noted in the painting areas.

#### **3.1.1.4 Fluorescent Penetrant Integrity Testing**

Douglas Aircraft uses a fluorescent penetrant/ultraviolet light system to test the integrity of the airplane parts it produces. The fluorescent penetrant is sprayed on airplane parts, such as airplane wings, in a large booth in Building 5 (Appendix C, Photograph 1). The parts are then exposed to ultraviolet light to detect irregularities such as cracks.

Inspectors noted leaking around the spray booth and the use of absorbent in some areas to contain this leakage (Appendix C, Photograph 1). Inspectors requested and received a Material Safety Data Sheet (MSDS) for the fluorescent penetrant (Appendix D). Facility representatives stated that, based on the MSDS and by knowledge of process, the used penetrant is not a RCRA-regulated hazardous waste.

### **3.1.2 Building 47**

The hazardous waste accumulation area is located near Building 47. This area is fenced, locked, and equipped with a sprinkler system. According to facility representatives, half of this area is constructed of concrete lined with Hypalon and the other half is constructed with coated concrete. The area contains three covered storage bays for separating incompatible wastes. Miscellaneous wastes are stored outside of the storage bays. In addition, there are several aboveground and underground storage tanks in this area.

Four IT Corporation employees were working in the accumulation area during the inspection. Two of these employees were repackaging wastes. The other two employees were classifying and otherwise managing the wastes in the accumulation area.

Approximately 350, 55-gallon drums were in the accumulation area at the time of the inspection. Also present were smaller containers and wastes stored in bags approved by the Department of Transportation. All drums, containers, and bags of wastes that could be inspected were within their 90-day accumulation limit. Observations made during the inspection regarding the crushing and repackaging area, storage bays, storage tanks, and miscellaneous wastes are described in the following subsections.

#### **3.1.2.1 Crushing and Repackaging Area**

According to facility representatives, empty paint cans and drums are crushed on-site and disposed of off-site in a landfill. IT Corporation is responsible for crushing containers in the accumulation area. Containers are crushed in one corner of the accumulation area. According to facility representatives, these containers are determined to be empty "by sight" prior to crushing.

During the inspection, IT Corporation employees were repackaging sealant tube wastes (EPA Hazardous Waste Numbers D007 and D008). Repackaging occurs near where containers are crushed. The contents of these small tubes (approximately 4 inches in length) are used to "patch up" small imperfections in airplane part exteriors. These tubes were being repackaged by placing similar tubes in 55-gallon steel drums.

No potential violations were noted in the crushing and repackaging area.

### **3.1.2.2 Storage Bays**

There are three storage bays in the accumulation area: the first bay holds polychlorinated biphenyl (PCB) wastes, the second bay holds acidic wastes, and the third bay holds flammable wastes. The bays are bermed, covered, and separated by concrete walls.

During the inspection, there were approximately 10, 55-gallon drums of PCB wastes in the first bay. All drums were labeled and in good condition. According to facility representatives, the contents of these drums have been analyzed and do not contain PCBs at greater than or equal to 50 ppm; these wastes, therefore, are not RCRA-regulated hazardous wastes.

Approximately 40, 55-gallon drums of acidic wastes were in the second bay during the inspection. These drums were primarily poly drums, stored on pallets, and stacked two-high in some areas. This bay appeared to be near full-capacity. The drums were all labeled and consisted primarily of corrosive liquid and solid wastes (salts) classified as D002 and D007 wastes. All drums inspected were in good condition, and inspectors did not note any leakage on the floor of the bay. However, there was inadequate aisle space and inspectors could not access drums along the sides of the bay (Appendix C, Photographs 2 and 3).

During the inspection, there were over 100, 55-gallon drums of flammable wastes in the third bay, which is several times larger than the other bays (Appendix C, Photograph 4). According to facility representatives, the drummed wastes in this bay (primarily solvent/paint sludges) are consistently produced at the facility and have similar characteristics. However, inspectors noted that these drums were classified inconsistently: some drums were classified as D001/F002/F003/F005 and some were classified as F002/F003/F005. Facility representatives, stated that the D001/F002/F003/F005 classification is most accurate and would be used to consistently classify these wastes in the future.

In addition, there were approximately 20 large, DOT-approved bags of rags in the third bay. These rags were classified F002/F003/F005 hazardous wastes.

### **3.1.2.3 Storage Tanks**

Six aboveground tanks and two underground tanks are used to store wastes. The above ground poly tanks are approximately 2 years old, and the underground steel tanks are approximately 1 year old.

The aboveground tanks are located adjacent to each other in a tank farm. Each tank contains approximately 4,000 gallons. Each tank area is lined with coated concrete and enclosed by a coated concrete berm that allows 100 percent containment. The tanks are currently used as follows:

<u>Tank</u>	<u>Contents</u>
1	Acidic wastes
2	Acidic wastes
3	Cyanide wastes
4	Waste water
5	Empty
6	Empty

Near the aboveground tank farm is a mobile waste acid treatment unit run by a consultant, PPG (formerly Thortec). According to facility representatives, this unit is on-site temporarily, has been in operation for 1 month, and is permitted by the California Department of Health Services.

Facility representatives stated there was only one spill in the aboveground tank farm. The spill was attributed to a faulty valve in a tank containing chromic/nitric/sulfuric acid. Facility representatives stated that the spill was completely contained in the tank's bermed area and the spilled material was removed completely.

The underground tanks are located next to each other along the accumulation area fence but outside of the accumulation area. One tank is used to hold waste solvent and the other is used to hold waste oil. Each tank contains approximately 4,915 gallons. Facility representatives provided a Tank Installation Report prepared by EMCON Associates in April 1990 (Appendix E). According to this document, the tanks are doubled-walled steel tanks. The outer wall is coated to protect against corrosion. The tanks are equipped with audible and visual leak detectors. According to facility representatives, these tanks have not leaked.

No potential violations were noted regarding the storage tanks.

#### **3.1.2.4 Miscellaneous Wastes**

Inspectors noted a wide variety of other miscellaneous wastes in the accumulation area. These wastes were being stored in uncovered portions of the accumulation area and included the following:

<u>EPA Hazardous Waste Number</u>	<u>Description</u>	<u>Approximate Quantity</u>
D001/D002	Desmut filter cake	16, 55-gallon drums
D001/D002	Kolene wax	8, 55-gallon drums
D002	Nitric acid-contaminated rags	Several drums
D007/D008	Sealant tubes	64, 55-gallon drums
D009	Waste mercury	3, 55-gallon drums
P029	Copper cyanide wastes	6, 30-gallon drums
P030	Cyanide wastes	10, 55-gallon drums
P106	Sodium cyanide wastes	2, 55-gallon drums
None	Aluminum-lithium solid wastes	4, 55-gallon drums
None	Waste oil	40, 55-gallon drums
None	Asbestos wastes	2 bins

There were also 8, 55-gallon drums of aluminum trihydrate solution in the accumulation area. Facility representatives stated these drums contained product they were trying to resell.

In addition, there were 16, 55-gallon drums dated July 24, 1990, in the accumulation area. These drums were affixed with U.S. Services labels but did not have any identifying markings regarding their contents. Facility representatives could not identify the contents of the drums. After the inspection, Mr. Ganoung contacted PRC and stated that the drums contained carbon adsorption filters from the conveyor paint system in Building 5. According to Mr. Ganoung, these filters are not hazardous waste and are regenerated off-site by U.S. Services. He stated that these drums should not have been placed in the accumulation area; instead, U.S. Services normally takes these drums off-site the same day the filters are replaced.

One of the drums of D001/D002 desmut filter cake was unlabelled (see black drum in Appendix C, Photographs 5 and 6). As such, no accumulation date was noted on the drum. However, this drum was marked in paint as "hazardous waste" and "desmut."

The various cyanide wastes in the accumulation area were classified as P-wastes. The P-waste code is intended for discarded commercial chemical products, off-specification species, container residues, or spill residues thereof. When asked if these drums contained cyanide



product or waste, facility representatives stated that the drums contained cyanide wastes. Inspectors informed the facility representatives that the P-waste classification is not appropriate for these wastes, and the IT Corporation employee stated he would reclassify these wastes appropriately.

In addition, inspectors noted one 55-gallon drum that was marked in paint as "hazardous waste - cyanide filters" (Appendix C, Photograph 7). However, the label on the drum indicated the waste was "non-RCRA." Facility representatives stated that the waste was RCRA-regulated and that the label would be corrected.

### **3.1.3 Buildings 85 and 87**

Buildings 85 and 87 are located adjacent to each other in the southern portion of the facility, east of Lakewood Boulevard. These buildings house only painting operations, which are similar in both buildings.

Inspectors noted one satellite accumulation area in each building. In Building 85, there were two drums of paint sludge dated August 14, 1990, and August 16, 1990. In Building 87, there were two drums of paint sludge with the same two dates. All drums were stored on pallets. As noted previously, the accumulation date is marked the day that waste is first put into the drum. Mr. Ganoung stated that each shop is instructed to call him to arrange for drum pickup within 60 days after the accumulation date is marked or when the drum is 90 percent full. Inspectors also noted a roll-off bin in each of the buildings. These bins are used to dispose of empty paint containers. Rinse waters and any spills of hazardous waste are collected in a trenching system in the buildings.

According to Mr. Ganoung, employees in this and other areas of the facility are instructed to contact the on-site fire department immediately if there are hazardous waste spills or other emergencies and, if appropriate, to evacuate the area. Shop personnel are instructed not to attempt to contain spills, other than turning off feed systems. This response procedure is designed to ensure that spills are properly handled.

Between Buildings 85 and 87 is a small capacity WWTP that handles chromium-contaminated rinse waters. As part of the treatment process, hexavalent chromium is converted into trivalent chromium. Facility representatives stated that filter cake from this WWTP is classified as a F006 hazardous waste.

No potential violations were noted in these buildings.

## **3.2 DOCUMENT REVIEW**

Inspectors reviewed the following hazardous waste management documents during and after the inspection: biennial reports, the contingency plan, and manifests. Observations made regarding these documents are described in the following subsections.

### **3.2.1 Biennial Reports**

Douglas Aircraft submits biennial reports and keeps these reports on file for a minimum of 3 years. Douglas Aircraft's 1990 biennial report (approximately 100 pages) was reviewed during the inspection. The facility completes the EPA biennial report form for their submittal; as a result, all required information was present and no deficiencies were noted.

### **3.2.2 Contingency Plan**

Douglas Aircraft maintains a complete, extensive contingency plan, which is distributed to local hospitals and other emergency services. As noted previously, Douglas Aircraft has its own on-site fire department and medical facility. The fire department has primary emergency authority. The contingency plan states that shop employees should not clean up spills but should instead immediately notify the fire department. In addition, shop employees are instructed to evacuate the area in an emergency and let the fire department handle all emergencies.

The contingency plan is updated frequently and contained current information, such as the names and phone numbers of emergency coordinators. No deficiencies were noted in the contingency plan.

### **3.2.3 Manifests**

The facility retains manifests for a minimum of 3 years. Inspectors reviewed manifests from 1988, 1989, and 1990. The facility retains on file completed manifests signed by the generator, transporter, and receiving facility. The manifests reviewed contained all required information. However, the facility does not retain copies of land disposal restriction (LDR) notifications. Mr. Ganoung stated that these forms are completed and sent off-site with the manifest, and that in the future Douglas Aircraft would make copies of LDR notifications and keep them on file with the manifests.

Based on the review of the manifests, wastes are currently disposed of as follows. Solvent/paint sludges (D001/F002/F003/F005) are transported off-site to ENSCO (ARD069748192), where they are incinerated. PCB wastes are sent off-site for disposal at U.S. Ecology. Empty drums are sent off-site to Chemical Waste Management's Kettleman Hills facility (CAT000646117).

As documented by the manifests, the majority of the wastes generated at the facility were land-disposed of prior to 1989. According to facility representatives, however, the only wastes that are currently sent off-site for land disposal are asbestos wastes, empty drums, filter cake, and solid PCB wastes.

According to discussions with facility representatives, the filter cake for the WWTP located east of Lakewood Boulevard should be classified as F006 and the filter cake for the WWTP located west of Lakewood Boulevard should be classified as F019, based on the waste streams they receive. Although inspectors noted manifests for F006 chromium filter cake, no manifests documenting off-site disposal of F019 sludge wastes were on file. Facility representatives stated that they had only recently decided that the F019 waste code designation was appropriate.

### **3.3 STATUS OF PREVIOUS VIOLATIONS**

No outstanding violations or orders against the facility were identified from review of EPA's files.

### **3.4 DISCUSSION WITH FACILITY MANAGEMENT**

After the facility walk-through and document review, inspectors discussed their observations with facility representatives. Douglas Aircraft is inspected infrequently by the County of Long Beach (its last inspection was approximately 2 years ago). The facility, therefore, generally operates under the assumption it is complying with RCRA requirements; for example, the facility representatives stated they do not maintain LDR notifications because they were not aware that copies of these documents should be kept. The facility appeared willing to correct its potential violations, such as maintaining copies of LDR notifications, to comply with RCRA, and was willing to provide information requested by the inspectors.

Inspectors stated they were concerned that there was inadequate communication between the facility representatives and the IT Corporation employees in the accumulation area regarding waste classification. For example, the inspectors expressed concern that the F019 classification,

which was recently determined for sludges from the WWTP west of Lakewood Boulevard, was not being used by IT Corporation.

#### 4.0 POTENTIAL VIOLATIONS

Potential violations of RCRA regulations are listed below. Each potential violation includes: (1) description of how the regulatory performance standard was not met; (2) reference to the hazardous waste management unit or location of the potential violation; (3) reference to photographs or other documents as appropriate to ensure that all potential violations cited are substantiated; and (4) reference to the specific paragraph and subparagraph of the RCRA regulations violated.

- Douglas Aircraft misclassifies its copper cyanide wastes as P029, its cyanide wastes as P030, and its sodium cyanide wastes as P106; these classifications are inappropriate since these waste are not discarded commercial chemical products, off-specification species, container residues, or spill residues thereof. In addition, at the time of the inspection, the label on one drum marked "hazardous waste - cyanide filters" (Appendix C, Photograph 7) indicate the waste was "non-RCRA," when it should have been marked as a RCRA-regulated hazardous cyanide waste. [40 CFR Part 262.11]
- One unlabeled drum of desmut in the accumulation area did not have an accumulation date marked on it. [40 CFR Part 262.34(a)(2)]
- There was inadequate aisle space in the bay containing acidic wastes in the accumulation area at Building 47 (Appendix C, Photographs 2 and 3). [40 CFR Part 262.34(a)(4) directing to 40 CFR Part 265.35]
- Douglas Aircraft does not maintain copies of LDR notifications sent off-site with manifests. [40 CFR Part 268.7(a)(6)]

**APPENDIX A**  
**CEI CHECKLIST**

GENERATORS OF HAZARDOUS WASTE  
CEI CHECKLIST

For Facilities which only Generate,  
and Do Not Treat Store or Dispose of Hazardous Waste

SITE ID#: C A D 0 0 8 3 7 8 0 4 4

INSPECTION DATE:

AUG. 21, 1990

SITE NAME: DOUGLAS AIRCRAFT CO.

LOCATION: 3855 LAKEWOOD BLVD.

LONG BEACH  
City

CA 9 0 8 4 6  
State Zip Code

LEAD INSPECTOR: BARBARA SODIKOOS

OFFICE: PRC

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INDEX FOR GENERATOR'S CHECKLIST

40 CFR

Subpart  
& Page Content

261+  
262:

- 1: GENERATOR DETERMINATION
- 2: HW DETERMINATION RECYCLABLE MATERIALS
- ~~3: CONDITIONALLY-EXEMPT SMALL-QUANTITY GENERATORS~~
- 4: GENERATORS - All not conditionally exempt
- ~~5: 100-1000 kg/month GENERATORS~~
- 7: FULLY REGULATED GENERATOR REQUIREMENTS
- 8: MANIFESTS
- 10: PRE-TRANSPORT REQUIREMENTS
- 12: RECORD KEEPING AND REPORTING
- ~~14: EXPORTS~~
- ~~18: IMPORTS~~
- ~~19: FARMERS~~

265:

- B1 GENERAL FACILITY STANDARDS- PERSONNEL TRAINING

40 CFR

Subpart  
& Page Content

265: Continued

- C1 PREPAREDNESS & PREVENTION
- D1 CONTINGENCY PLAN & EMERGENCY PROCEDURES
- I1 USE AND MANAGEMENT OF CONTAINERS
- J1 TANKS

266:

- ~~G1 RECYCLABLE MATERIALS USED IN A MANNER CONSTITUTING DISPOSAL~~
- ~~D1 HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY~~
- ~~E1 USED OIL BURNED FOR ENERGY RECOVERY~~
- ~~F1 RECYCLABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY~~
- G1 LEAD-ACID BATTERIES RECLAMATION

268: LAND DISPOSAL RESTRICTIONS

Also Completed: Transporter \_\_\_\_\_

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY.

Facility Representatives:

Dave Ganoung  
Robert Tomko  
Ron Fornator  
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\_\_\_\_\_

Other Inspectors:

Gordon Ballentine  
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Documents Copied or Requested:

MSDS for penetrant

Areas Present / Inspected:

Bldgs. 85 & 87, 5, 3;  
H.W. Accumulation Area

Facility Recipient  
of Report

Dave Ganoung

Internal Mail Code 11-11

Mailing Address  
(if different)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Generators - General:  
(Part 261 Subpart A and Part 262 Subpart A)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<u>90-Day Storage</u>			
If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)	✓	_____	_____
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	_____	✓	<u>1 unlabeled drum of desmut</u>
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	✓	_____	_____
If the generator has stored HW on-site for more than 90 days*, have they:			
Been granted an extension from EPA? or:	_____	_____	NA
Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270 of RCRA?	_____	_____	↓
Has the generator of solid wastes made a HW determination by determining if the waste is: 262.11	_____	✓	Generator is inappropriately designating waste as P-wastes - generator classified "cyanide filters" hazardous waste as non-RCRA.
(a) Excluded from regulation under 261.4?	✓	_____	<u>NPDES discharges</u>
(b) Listed as a HW in 261 Subpart D?	✓	_____	<u>Various F- and P-wastes</u>
(c) Exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	✓	_____	<u>Various D-wastes</u>
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	✓	_____	_____



Generators - General: - Continued  
(Part 262 Subpart A)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	<u>✓</u>	<u>      </u>	

Recyclable Materials

If the wastes are any of the following recyclable materials, also complete Part 266 Subparts C-G. 261.6(a)(2)

(i) Those used in a manner constituting disposal (Subpart C)?	<u>      </u>	<u>✓</u>	
(ii) HW burned for energy recovery in boilers and industrial furnaces not regulated as an incinerator (Subpart D)?	<u>      </u>	<u>✓</u>	
(iii) HW characteristic used oil that is burned as above (Subpart E)?	<u>      </u>	<u>✓</u>	
(iv) Those from which precious metals are reclaimed (Subpart F)?	<u>      </u>	<u>✓</u>	
(v) Spent lead-acid batteries that are reclaimed (Subpart G)?	<u>      </u>	<u>✓</u>	

Note: The following recyclable materials are exempt from EPA RCRA regulation: 261.6(a)(3)-

- (1) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement).
- (2) Used batteries or cells returned to the manufacturer for regeneration.
- (3) Used oil not burned for energy recovery.
- (4) Scrap metal.
- (5-9) Specified steel (K087) and petroleum refinery production wastes.

Generators of Between 100 and 1000 kg/month - Continued  
Fully Regulated Generators  
(Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling HW? 262.12(a)	✓	_____	Submitted Notification on 6/27/80
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	✓	_____	_____
<u>Generation Points (Satellite Accumulation)</u>			
The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)			
They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:	✓	_____	5- to 10-gal containers for spent solvents; 55-gal drums for soiled rags; some roll-off bins for paint containers.
The area is under the control of the operator of the process generating the waste? and:	✓	_____	_____
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?	✓	_____	_____
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?	✓	_____	_____
When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2)-			
Continue to comply with the storage requirements above? and:	✓	_____	Per facility reps
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:	✓	_____	↓
Comply with all 90-day storage requirements (262.34(a)) within three days?	✓	_____	↓

Manifests:  
(Part 262 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
General Requirements: 262.20-			
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	✓	—	_____
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	✓	—	_____
(c) Has the facility designated an emergency alternate facility? or:	—	✓	_____
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	✓	—	_____
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	✓	—	_____
(b) Where the generating facility is located?	✓	—	_____
(c) If not provided by either state, the EPA form from another source?	—	—	NA
Did the manifest consist of enough copies? 262.22	✓	—	_____
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?	✓	—	_____
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	✓	—	_____
(3) Keep one copy of the manifest (per 262.40(a))?	✓	—	_____
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	✓	—	_____

Manifests:  
(Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Manifests: Continued-			
If the shipment was sent by <u>water or rail</u> , did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)			NA

Pre-Transport Requirements:  
(262 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	<u>✓</u>	—	<u>Per facility rep</u>
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	<u>✓</u>	—	
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:	<u>✓</u>	—	
Proper shipping name [table column 2]? <u>✓</u>	<u>✓</u>	—	
Proper ID number [table column 3A]? <u>✓</u>	<u>✓</u>	—	
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes? <u>✓</u>	<u>✓</u>	—	
Are containers of 110 gallons or less marked with the following words: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address _____	<u>✓</u>	—	
Manifest Document Number _____	<u>✓</u>	—	
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	<u>✓</u>	—	

Record Keeping and Reporting:  
(Part 262 Subpart D)

Are the following kept for at least three years:

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(a) Manifest signed by the receiving facility?	✓	_____	_____
(b) Biennial Reports and Exception Reports?	✓	_____	_____
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	✓	_____	_____

Biennial Report:

If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the RA by March 1 of each even numbered year? 262.41(a)

✓

Reviewed 1990 Biennial Report

Was the report submitted on EPA Form 8700-13A and cover generator activities during the previous calendar year? 262.41(a)

✓

Does the report include the following information: 262.41(a)-

(1) EPA ID No., name and address of the generator?

✓

(2) Calendar year covered by the report?

✓

(3) The EPA ID No., name, and address for each off-site U.S. TSD to which HW was shipped during the year?

✓

(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. TSD?

✓

(5) Description, EPA HW No., DOT hazard class and quantity of each HW shipped off-site to a U.S. TSD?

✓

(i) Was this information listed by EPA ID No. of each off-site U.S. TSD to which HW was shipped?

✓

Record Keeping and Reporting: - Continued  
(Part 262 Subpart D)

(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?	✓	_____	_____
(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?	✓	_____	_____
(8) The signed certification?	✓	_____	_____

Exception Reporting: 262.42(a)-

(1) For a generator of more than 1000 kg/mo. that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the HW?

NA - no exception reports  
ever needed

(2) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA?

Did the Exception Report include:  
262.42(a)-

(i) A legible copy of the manifest? \_\_\_\_\_

(ii) A signed cover letter explaining the efforts taken to locate the HW and the results of those efforts?

General Facility Standards:  
(Part 265 Subpart B)

	Yes	No	Comments
Does the facility have a HW personnel training program? 265.16(a)(1)	✓		Primarily in-house
Is it directed by a person trained in HW management procedures? 265.16(a)(2)	✓		
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	✓		Per facility reps
(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?	✓		
(ii) Key parameters for automatic waste feed cut-off systems?	✓		
(iii) Communication or alarm systems?	✓		
(iv) Response to fire or explosions?	✓		Employees instructed to evacuate and notify supervisor
(v) Response to ground water contamination incidents?	✓		↓
(vi) Emergency shutdown of operations?	✓		
Are new personnel supervised until training is completed? 265.16(b)	✓		Per facility rep
Do new personnel complete the training within 6 months? 265.16(b)	✓		
Do personnel take part in an annual review of the initial training? 265.16(c)	✓		
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?			NI
(2) Job Description?			↓
(3) Description of required HW training?			↓





General Facility Standards: - Continued  
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(4) Documentation that HW training or job experience required has been completed?	_____	_____	NI
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	_____	_____	↓

Preparedness and Prevention:

(Part 265 Subpart C)

<u>Yes</u>	<u>No</u>	<u>Comments</u>
------------	-----------	-----------------

**Location Standards:**

The facility did not place HW in a salt dome, salt bed formation, underground mine or cave?

✓

Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31

✓

Does the facility have the following  
equipment where applicable: 265.32-

(a) Internal communications or alarm system capable of providing immediate emergency instruction?

✓

(b) Telephone or 2-way radios at the scene of operation?

✓

(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?

✓

(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?

y

Does the facility test and maintain all emergency equipment in operable condition? 265.33

✓

Do personnel in areas where HW is being handled have immediate access to internal alarm or communication systems, or voice or visual contact with another employee?  
265.34(a) ✓

✓

Can personnel that operate the facility while alone immediately access external emergency assistance?  
265.34(b)

4

Preparedness and Prevention - Continued  
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35	<u>          </u>	<u>  ✓  </u>	<u>Inadequate aisle space in acid storage bay in accumulation area</u>
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements/agreements:			
Familiarize police, fire dept., and emergency response teams with HW operations? 265.37(a)(1)	<u>  ✓  </u>	<u>          </u>	<u>Submits Contingency Plan</u>
Designate primary emergency authority? 265.37(a)(2)	<u>  ✓  </u>	<u>          </u>	<u>On-site Fire Dept. &amp; Medical Facility</u>
With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)	<u>  ✓  </u>	<u>          </u>	<u>  </u>
Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)	<u>  ✓  </u>	<u>          </u>	<u>  </u>
Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)	<u>          </u>	<u>          </u>	<u>NA - no refusals</u>

Contingency Plan and Emergency Procedures:  
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility have a contingency plan designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents? 265.51(a)	<u>✓</u>	—	_____
Does the plan describe actions personnel must take to comply with 265.51 and 265.56 responses? 265.52(a)	<u>✓</u>	—	<u>Personnel told to evacuate and notify supervisor</u>
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	<u>✓</u>	—	_____
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)	<u>✓</u>	—	_____
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility? 265.52(d)	<u>✓</u>	—	_____
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	<u>✓</u>	—	_____
Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	<u>✓</u>	—	_____
Is the plan maintained at the facility? 265.53(a)	<u>✓</u>	—	<u>Reviewed during inspection</u>
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	<u>✓</u>	—	<u>Per facility rep</u>
Has the plan been reviewed any immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?	<u>✓</u>	—	_____
(b) The plan fails in an emergency?	<u>✓</u>	—	_____
(c) Facility changes required it?	<u>✓</u>	—	_____

Contingency Plan and Emergency Procedures: - Continued  
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(d) The list of emergency coordinators changes?	✓		
(e) The list of emergency equipment changes?	✓		
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	✓		
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	✓		
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	✓		
If an emergency situation has occurred at this facility, did the emergency coordinator (EC) immediately:			No releases of H.W.; however, there have been fuel releases (see Tank checklist for tank releases)
Activate alarm systems? 265.56(a)(1)			↓
Notify the appropriate response agencies? 265.56(a)(2)			
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)			
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)			

Contingency Plan and Emergency Procedures: - Continued  
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If assessment indicates the release could threaten harm outside the facility, does the EC: Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)	<input type="checkbox"/>	<input type="checkbox"/>	No H.W. releases
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800/424-8802? 265.56(d)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Did the report include: 265.56(d)(2)-			
(i) The name and phone # of the reporter?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) Name and address of the facility?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) Time and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(iv) Name and quantity of materials involved to the extent known?	<input type="checkbox"/>	<input type="checkbox"/>	
(v) The extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(vi) The possible hazards to the outside area?	<input type="checkbox"/>	<input type="checkbox"/>	
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)	<input type="checkbox"/>	<input type="checkbox"/>	
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)	<input type="checkbox"/>	<input type="checkbox"/>	
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)	<input type="checkbox"/>	<input type="checkbox"/>	↓

Contingency Plan and Emergency Procedures: - Continued  
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the EC ensure that in the affected areas of the facility: 265.56(h)-			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	—	—	No H.W. releases
(2) All emergency equipment is clean and fit for use before operations resume?	—	—	
Does the facility notify the R.A., state and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	—	—	
If the contingency plan has been implemented:			
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	—	—	
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	—	—	
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	—	—	
(2) Name, address, and phone # of the facility?	—	—	
(3) Date, time, and type of incident?	—	—	
(4) Name and quantity of materials involved?	—	—	
(5) The extent of any injuries?	—	—	
(6) A hazard assessment?	—	—	
(7) An estimate of the quantity and disposition of recovered material?	—	—	↓



Use and Management of Containers:  
(Part 265 Subpart I)

<u>Yes</u>	<u>No</u>	<u>Comments</u>
------------	-----------	-----------------

A generator may accumulate HW on-site for 90 days or less without having a permit or interim status, provided that the waste is placed in containers that comply with the interim status requirements (Subpart I). Does the facility also comply with the Preparedness and Contingency Plan requirements of Subparts C and D?

Inadequate aisle space in acid storage bay

Does the facility transfer HW from containers not in good condition or leaking to containers in good condition? 265.171

No drums in unsafe condition noted.

Are containers compatible with the HW  
stored in them? 265.172

The metal drums containing  
combustives are lined to prevent  
damaging drums

Are containers stored closed?  
265.173(a)

Are containers managed to prevent rupture or leakage? 265.173(b)

Are containers inspected weekly for leaks and deterioration? 265.174

Inspection log maintained

Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176

Are incompatible wastes stored in separate containers? 265.177(a)

Is HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)

Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device?

265.177(c)

Incompatibles separated by walls in the accum. area

Use and Management of Containers: - Continued  
(Part 265 Subpart I)

	Yes	No	Comments
Are containers or inner liner that are not empty managed as HW? 261.7(a)(2)			NI - none noted during inspection
For a container to be considered empty, the facility must ensure that no more remains than:			261.7(b)(1)-
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:	✓		
(ii) One inch of residue on bottom of container or inner lining? or:	✓		Checked visually
(iii) (A) If the container is not over 110 gallons in size, 3% of weight when full?			NA
(iii) (B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:			↓
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	✓		
If a container (or liner removed from the container) has held an acute HW, it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	✓		
(ii) Cleaned by another proven removal means? or:		✓	
(iii) For the container, the liner prevented contact and has since been removed?		✓	

See also 265.31 (p. C1).

ACCUMULATION AREAS &  
CONTAINERS

Accumulation if Less than 55 gallons

The generator may accumulate at or near the point of initial generation: up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:

The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)

AND

The containers are in good condition 265.171.

AND

The containers are compatible with the waste 265.172.

AND

The containers are stored closed 265.173(a).

AND

The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).

Accumulation if greater than 55 gallons

Are containers visibly marked with:

The date that the waste accumulation started? 262.34(a)(2)

The words "hazardous waste"? 262.34(a)(3)

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).

Names of accumulation areas		
Numerous generation pts. w/i buildings	Main Acc. Area	
	Bldg. 47	
yes	NA	
yes		
yes		
yes		
yes		
NA	NO - Unlabeled drum of desmut	
	YES	
	yes	

Does the generator comply with the requirements of 40 CFR Part 265: Subpart I for the use and management of containers listed below. 262.34(a)(1)

Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171.

Are containers compatible with the H.W. stored in them? 265.172.

Are containers stored closed? 265.173(a).

Are containers managed to prevent rupture or leakage? 265.173(b).

Are containers inspected weekly for leaks and deterioration? 265.174.

Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176.

Are incompatible wastes stored in separate containers? 265.177(a).

Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b).

Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c).

Does the generator comply with the requirements with 40 CFR Part 265.37: arrangements with local authorities?

Does the generator comply with the requirements of 40 CFR Part 265: Subpart D for contingency plan and emergency procedures?

Does the generator comply with the requirements of 40 CFR Part 265.16 for personnel training in emergency procedures?

Names of accumulation areas		
	Main Acc. Area	
	(Bldg. 47)	
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
	See Main checklist	
	See Main checklist	
	See Main checklist	

10/13/88

Page 3 of 3

Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.

Does the facility have the following equipment where applicable: 265.32-

(a) Internal communications or alarm system capable of providing immediate emergency instruction?

(b) Telephone or 2-way radios at the scene of operation?

(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?

(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?

Are the systems and equipment listed above tested? 265.33.

Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?

Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35.

Names of accumulation areas		
	Main Acc. Area (Bldg. 47)	
	NO	
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
	No - inadequate aisle space in acid storage bay	

Tanks:  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are tanks used to store or treat HW exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	—	✓	_____
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	—	✓	_____
If a 100-1000 kg/mo. generator, see Part 262 checklist.			
Are HW or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	✓	—	6 above-ground poly tanks 2 USTs (1 for waste oil, 1 for waste solvent)
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings? ✓	—	—	_____
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank? ✓	—	—	_____
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?	—	—	NA - covered tanks
Are daily inspections done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems? ✓	—	—	_____
(2) Corrosion or releases of waste in above ground portions? ✓	—	—	_____
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells? ✓	—	—	_____

Note: If the primary purpose of this inspection is to evaluate compliance with HW storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(4) Construction materials and area surrounding the tank, including secondary containment (e.g., dikes) for erosion or signs of releases (e.g., wet spots, dead vegetation)?	✓	_____	_____
Are sources of impressed current inspected at least every other month? 265.195(b)(2)	_____	_____	NA - Extens <sup>on</sup> of 2 <sup>ary</sup> containment tanks for USTs are coated, ∴ no cathodic protection is in place.
Are cathodic protection systems inspected six months after initial installation and then annually? 265.195(b)(1)	_____	_____	↓
If a leak has occurred in the tank system, has the facility complied with 265.196 (p. J9)? 265.194(c)	✓	_____	_____
Ignitable and reactive waste:			
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.198(a)(1)(i-ii) or:	_____	✓	1 underground solvent storage tank
Is ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.198(a)(2) or:	✓	_____	_____
Is the tank used solely for emergencies? 265.198(a)(3)	_____	✓	_____
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in table 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.198(b)	_____	_____	NA - underground tank
Are incompatible wastes stored in separate tanks? 265.199(a)	✓	_____	_____

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is HW not placed in non-decontaminated tanks that previously held an incompatible waste or material? 265.199(b)	<u>✓</u>	<u>      </u>	<u>      </u>
Whenever a tank system is to be used to chemically treat or store a HW which is substantially different from waste previously handled in the tank, or chemically treat HW with a substantially different process than was previously used, did the facility: 265.200-			NA
(a) Conduct waste analysis and trial treatment or storage tests (bench-tests)? or:	<u>      </u>	<u>      </u>	<u>      </u>
(b) Have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions?	<u>      </u>	<u>      </u>	<u>      </u>
Construction, containment, and assessment:			
Was the tank system or component used to treat HW installed after 7/14/86? <u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
If YES, go to 265.192, new tank systems (next page).			6 above-ground : ~ 2 yrs old 2 below-ground : > 1 yr old
If an existing tank system (installation commenced or committed before 7/14/86) with a secondary HW containment system, go to 265.193 (p. J6)	<u>      </u>	<u>      </u>	NA
If an existing tank system without complying secondary containment, has the facility determined whether the tank system is either not leaking or unfit for use? 265.191(a)	<u>      </u>	<u>      </u>	<u>      </u>
If found to be leaking or unfit for use, has the facility complied with 265.196 (p. J9)? 265.191(d)	<u>      </u>	<u>      </u>	<u>      </u>
If fit for use, has the facility obtained a written assessment that attests to the tank system's integrity by 1/12/88*? 265.191(a)	<u>      </u>	<u>      </u>	<u>      </u>
* Or within 12 months after their waste is listed as HW. 265.191(c)			



Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was the assessment on file at the facility, and certified by an independent, registered professional engineer? 265.191(a)	<u>    </u>	<u>    </u>	NA
Did the assessment consider: 265.191(b)-			
(1) Original blueprints and standards?	<u>    </u>	<u>    </u>	
(2) HW characteristics?	<u>    </u>	<u>    </u>	
(3) Existing corrosion protection measures?	<u>    </u>	<u>    </u>	
(4) Documented age of tank, if known?	<u>    </u>	<u>    </u>	
(5) Leak test, internal inspection, or integrity test results?	<u>    </u>	<u>    </u>	
Design and installation of new tank systems:			
Does the facility have a tank system or component that is used to treat or store HW and was installed after 7/14/86?	<u>✓</u>	<u>    </u>	6 above-ground (poly) and 2 below-ground (steel)
Has the facility obtained an assessment certified by an independent, registered, professional engineer attesting that the tank or component design is acceptable? 265.192(a)	<u>✓</u>	<u>    </u>	4/90 Installation report for waste solvent Only evaluated UST during the CEI.
Did the assessment include: 265.192(a)-			
(1) Construction and design standards?	<u>✓</u>	<u>    </u>	
(2) Hazardous characteristics of the wastes to be handled?	<u>✓</u>	<u>    </u>	Solvent waste
(3) Corrosion? (see next page)	<u>✓</u>	<u>    </u>	Coated 2 <sup>nd</sup> containment tank
(4) Protection against vehicular traffic?	<u>✓</u>	<u>    </u>	Area is fenced
(5)(i) Strength of the foundation?	<u>✓</u>	<u>    </u>	
(5)(ii) Anchoring to prevent flotation or dislodgement?	<u>    </u>	<u>    </u>	NA
(5)(iii) Effects of frost heave?	<u>    </u>	<u>    </u>	NA
Are certifications on file to attest that the installation steps and inspections, and any required repairs, were properly performed? 265.192(g)	<u>✓</u>	<u>    </u>	

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the installation include before-use inspection and repair of any: 265.192(b)-			
(1) Weld breaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2) Punctures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(3) Scrapes of protective coating?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(4) Cracks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(5) Corrosion?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(6) Other damage or inadequacies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Was the proper backfilling of underground tanks or components certified? 265.192(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Was the proper backfilling of underground tanks or components certified? 265.192(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Were all tanks tested (and repaired) for tightness? 265.192(d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pressure tested with air by Fire Dept. on 8/16/89.
Were ancillary equipment certifiably supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, and contraction? 265.192(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Swing joints used to compensate for possible seismic activity.
New tank corrosion certification:			
Where the external shell of a metal tank or any metal component touches soil or water, was the tank design and installation supervised and certified by a corrosion expert? 265.192(a)(3)	<input type="checkbox"/>	<input type="checkbox"/>	NA - UST 2 <sup>ary</sup> containment tank is lined. The 6 above-ground tanks are constructed of poly.
Did the corrosion certifications consider these factors: 265.192(a)(3)(i)-			
(A) Soil moisture content?	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Soil pH?	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Soil sulfides level?	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Soil resistivity?	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Structure to soil potential?	<input type="checkbox"/>	<input type="checkbox"/>	
(F) Influence of nearby underground metal structures or piping?	<input type="checkbox"/>	<input type="checkbox"/>	
(G) Stray electric current?	<input type="checkbox"/>	<input type="checkbox"/>	

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(H) Existing corrosion-protection measures (coating, cathodic protection, etc.)?	_____	_____	NA
Was at least one of the following used to ensure tank integrity: 265.192(a)(3)(ii)-			
(A) Corrosion-resistant constructions materials such as special alloys fiberglass-reinforced plastic, etc.?	_____	✓	_____
(B) Corrosion-resistant coatings such as epoxy or fiberglass?	✓	_____	For solvent VST
(C) Electrical isolation devices such as insulating joints, flanges, etc.?	_____	✓	_____
Was a secondary containment system provided for any: 265.193(a)-			
(1) New tank systems or components before installation?	✓	_____	2 am <sup>2</sup> containment provided for 6 above-ground tanks and 2 VSTs.
(2) Existing tanks used to treat or store F020, F021, F022, F023, F026, F027, by 1/12/89?	_____	_____	NA - no "existing" tanks
(3) Existing tanks of proven age, by the later of 1/12/89 or 15 years old?	_____	_____	
(4) Existing tanks of undocumented age, by 1/12/95, or if the facility was built before 1980, by the later of 1/12/89 or the facility reaching 15 years of age?	_____	_____	
(5) Tank systems that handled materials that became hazardous wastes after 1/12/87, within two years of regulation or the facility reaching 15 years of age?	_____	_____	
If NO, to any of the above, has a variance been obtained from the RA?	_____	_____	

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are the containment systems: 265.193(b)-			
(1) Designed, installed, and operated to prevent any releases to soil or water at any time during operation? and:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Above-ground tanks have bermed containment areas; USTs are double-walled.
(2) Capable of detecting, collecting, and holding releases from the tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	USTs have audible & visual leak detectors.
To meet these requirements, are the containment systems: 265.193(c)-			
(1) Compatible with wastes handled, and strong enough to prevent failure due to pressure (including ground water), weather, installation, or daily operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2) Placed on a foundation that withstands settlement, compression, or uplift?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(3) Provided with a leak detection system that detects any releases within 24 hours (if possible)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(4) Sloped or drained to remove all liquids within 24 hours (if possible)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	above-ground tanks drain to sumps
Does the secondary containment for tanks include one of these devices: 265.193(d)-			
(1) A liner external to the tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6 above-ground tanks
(2) A vault?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(3) A double-walled tank? or:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2 underground tanks
(4) An equivalent approved by the RA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If an external liner is used, does it: 265.193(e)(1)-			
(i) Contain 100% of the largest tank volume?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6 above-ground tanks
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iii) Be free of cracks or gaps?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iv) Capable of preventing lateral and vertical migration of waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	lined concrete

Tanks: - Continued  
(Part 265 Subpart J)

If a vault system is used, does it: Yes No Comments  
265.193(e)(2)-

(i) Contain 100% of the largest tank volume?	—	—	NA
(ii) Either prevent run-off or rain from entering, or have added capacity to contain a 25-year, 24-hours storm?	—	—	
(iii) Have any joints sealed?	—	—	
(iv) Have an impermeable liner or coating over the concrete?	—	—	
(v) Protect against vapor formation from ignitable or reactive wastes?	—	—	
(vi) Have an exterior moisture barrier to prevent seep-in?	—	—	
			↓

If a double-walled tank is used, is it: 265.193(e)(3)-

(i) One integral structure?	✓	—	—
(ii) Protected from interior and exterior corrosion?	✓	—	—
(iii) Provided with a leak detection system capable of detecting a leak within 24 hours (if possible)?	✓	—	—

Is all ancillary equipment provided with full secondary containment e.g., trench, jacketing, double-walled pipe (except for the following if inspected daily for leaks): 265.193(f)-

(1) Above ground pipes?	—	—	NA - inspected daily for leaks
(2) Welded flanges, joints, and connections?	—	—	
(3) Seal-less or magnetic coupling pumps?	—	—	
(4) Pressurized above ground piping systems with automatic shut-off devices?	—	—	
			↓

Leaks, spills, unfit-for-use tanks:

If a tank system or secondary containment system has had a leak or spill, or is unfit for use, was it immediately removed from service? 265.196

Did the facility immediately stop the flow of HW into the system, and inspect to determine the cause of the release? 265.196(a)

✓	—	—	Leak from faucety valve in 1 above-ground tank containing chromic/nitric/sulfuric acids. Spill was contained in the bermed containment area.
✓	—	—	

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the release was from the tank system, within 24 hours of detection (if possible) did they remove enough waste to prevent further release and allow inspection and repair? 265.196(b)	✓	—	_____
If the release was to a secondary containment system, were all released materials removed in 24 hours? 265.196(b)(2)	✓	—	_____
If the release was to the environment, did the facility immediately conduct a visual inspection of the release? 265.196(c)- and:	—	—	NA - no releases to environment
(1) Contain it to prevent further migration to soils or surface water?	—	—	_____
(2) Remove and properly dispose of any visible contamination of the soil or surface water?	—	—	_____
Was the leak or spill of HW: 265.196(d)(2)-			
(i) Less than or equal to one pound?	—	—	_____
and,	—	—	_____
(ii) Immediately contained and cleaned up?	—	—	_____
If not, was the spill or leak reported to the RA within 24 hours? 265.196(d)(1)	—	—	_____
If the reportable leak was a release to the environment, was a full report submitted to the RA within 30 days of detection? 265.196(d)(3)	—	—	_____
Did the environmental release report include: 265.196(d)(3)-			
(i) Likely route of migration?	—	—	_____
(ii) Characteristics of the surrounding soil composition, geology, hydro-geology, and climate?	—	—	_____
(iii) Results of any monitoring or sampling? (See next page for continued question)	—	—	_____

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If not, were the results forwarded to the RA as soon as the analysis was received?	_____	_____	NA
(iv) Proximity to downgradient drinking water, surface water, and population areas?	_____	_____	↓
(v) A description of response actions taken or planned?	_____	_____	↓
 Repair, containment, or closure:			
If the cause of the release was a spill that did not damage the integrity of the system was waste removed and necessary repairs made before returning the system to service? 265.196(e)(2)	_____	_____	NA - system never returned to service, is currently inactive.
If the cause of the release was a leak from the primary tank system into the secondary tank system, was the system repaired before returning to service? 265.196(e)(3)	_____	_____	↓
If the source of any leak to the environment was from an aboveground, visually accessible component, was it repaired and certified before being returned to service? 265.196(e)(4)	_____	_____	
If the source of any leak to the environment was from a component or tank without secondary containment, and was below ground (or above ground but not readily accessible for visual inspection, e.g., the bottom of an onground tank), was the tank or entire component provided with secondary containment (265.193, p. J6) before being returned to service? 265.196(e)(4)	_____	_____	
If the answer to any of the above four questions was NO, did the facility close the unit in accordance with 265.197 (p. J11)? 265.196(e)(1)	_____	_____	
	_____	_____	

Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the facility has extensively repaired a tank system that leaked, was the repaired system certified capable by an independent, registered professional engineer? 265.196(f)	_____	_____	NA
Was the certification submitted to the RA within 7 days after returning the system to use? 265.196(f)	_____	_____	↓
If a tank system or component was replaced, did it comply with 265.192, new tanks (p. J4)? 265.196(e)(4)	_____	_____	
Tank closure and post-closure care:			
At closure, did the facility remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), structures, soil, and equipment? 265.197(a)	_____	_____	NA - no closure of tanks
If the facility demonstrated that all contaminated soils cannot be removed or decontaminated, did they close the tank and perform post-closure care as if a landfill? 265.197(b)	_____	_____	↓
If the facility has a tank system without complying secondary containment or an exemption, did they include contingent closure and post-closure plans covering the care and reporting provisions for landfills? 265.197(c)(1-2)	_____	_____	
Did they include the contingent plans in the cost estimate? 265.197(c)(3)	_____	_____	
Did they include the contingent plans' costs in the financial assurance and responsibility estimates? 265.197(c)(4-5)	_____	_____	





Land Disposal Restrictions:  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			

F001 through F005 spent solvents?	✓	✓	F-wastes
F020 through F026-28 Dioxins?	—	✓	
"California List" wastes?	—	✓	
First Third scheduled wastes?	✓	—	F019, P-wastes
Second Third scheduled wastes?	✓	—	P-wastes
Third Third	✓	—	D-wastes

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt  
small quantity generators? 268.1(c)(4) ✓

A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(5) ✓

An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d) ✓

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), \_\_\_\_\_ ✓ \_\_\_\_\_  
268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), \_\_\_\_\_  
268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.1(c)(2)

An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a) ✓

\*Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
A generator certifies a good-faith effort in compliance with 268.8 "soft-hammer" regulations? 268.1(c)(5)	_____	✓ _____	_____

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

Has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3	✓ _____	_____	_____
--	------------	-------	-------

Storage:

Are restricted wastes only being stored where: 268.50-

(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?

NA - no storage on-site

(a)(2) A TSD is accumulating a batch as above? and:

(i) Each container is marked with the contents and accumulation start date?

(ii) Each tank is marked with the contents, accumulation start date, quantity of HW, and/or the information is in the operating record?

(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? or:

(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation wide variance, or a valid "soft hammer" 268.8 certification?

(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?

(f) After 7/8/87, are liquid HW over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?

See p. 268:8 for off-site storage facility record keeping requirements.

Land Disposal Restrictions:- Continued  
(Part 268)

<u>Generators: Waste Analysis</u>	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	✓	—	—
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(1)	—	—	NA - no CA list liquids
Did the generator determine if liquid CA list wastes sludges and solids were CA list liquids? 268.32(j)(1)	—	—	
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	—	—	↓
Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.44 & -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.34(1)(2)	✓	—	knowledge of the waste
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	—	—	NA
<b>Notices, Certifications, and Demonstrations:</b>			
If determined that the waste is <u>restricted and requires treatment</u> before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	—	—	Per facility rep - however, facility does not keep copies of notifications sent.
(i) EPA HW ID number?	✓	—	—
(ii) Appropriate treatment standards and prohibitions?	✓	—	—
(iii) Manifest number for the waste?	✓	—	—
(iv) Available waste analysis data?	✓	—	—

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the waste is determined to be <u>restricted but not required further treatment</u> , has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	_____	_____	NA - all restricted wastes on-site require treatment

Did the notification include: 268.7(a)(2)(i)-

(a) EPA HW ID number?	_____	_____	↓
(b) Appropriate treatment standards and prohibitions?	_____	_____	
(c) Manifest number for the waste?	_____	_____	
(d) Available waste analysis data?	_____	_____	

Was the following certification signed: 268.7(a)(2)(ii)-

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

If the generator's waste is subject to a national variance, an extension or an exemption, have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)

NI - copies of LDR notifications not kept (see violation under 268.7(a)(6))

Did the notice include: 268.7(a)(3)-

(i) EPA HW ID number?	_____	_____	↓
(ii) Appropriate treatment standards and prohibitions?	_____	_____	
(iii) Manifest number for the waste?	_____	_____	
(iv) Available waste analysis data?	_____	_____	
(v) The date the waste is subject to prohibitions?	_____	_____	

NOTE: If the recipient of the generator's waste is not on the attached list (p. 12) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 12 for proper follow-up.


Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If determined that the waste is a <u>First Third or Second Third</u> waste without <u>treatment standards</u> and not a CA list waste (and thus a "soft hammer" waste), have they notified the receiving facility with each shipment? including: 268.7(a)(4)-	—	—	NI - no copies of LDR notifications kept on-site (see violation under 268.7(a)(6))
(i) EPA HW ID number?	—	—	↓
(ii) Appropriate certifications and the restrictions under 268.33(f) for "soft hammer" waste?	—	—	
(iii) Manifest number for the waste?	—	—	
(iv) Available waste analysis data?	—	—	
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)	✓	—	
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	—	✓	Facility does not maintain a copy of LDR notifications sent off-site w/ manifests
Generators of First Third and Second Third "soft hammer" wastes (268.33(f)) shipped for land disposal:			
Prior to shipment for land disposal, has the generator certified and submitted to the RA a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit? 268.8(a)(1-2)	—	—	NI - no copies of LDR notifications kept on-site (see violation under 268.7(a)(6))
Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)	—	—	↓

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste? 268.8(a)(3) or -(4)	—	—	NI - no copies of LDRE notifications kept on-site
Was a copy of the certification submitted with each shipment of waste? 268.8(a)(3) or -(4)	—	—	
Are copies of the demonstration and certification kept on-site for at least five years? 268.8(a)(3) or -(4)	—	—	
If the generator determined there is <u>no practical treatment</u> for his waste, did the demonstration include a written discussion and the following certification? 268.8(a)(2)(i)	—	—	
I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.			
If the generator determines that there <u>are practical treatments</u> for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)	—	—	
Did they include the following certification? 268.8(a)(2)(ii)	—	—	✓
I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.			
Has the generator immediately notified the RA of any changes in the conditions on which the certification was based? 268.8(b)(1)	—	—	NA - no changes noted

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the RA invalidated a certification, has the generator immediately ceased shipments of wastes, informed all facilities that received the waste, and retain records of the communication on-site in their files? 268.8(b)(3)			NA - no certifications invalidated
<u>Treatment Facilities: Waste Analysis</u>			
Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)			NA - not a treatment facility
Were the non-wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, incinerated in accordance with the requirements of Part 264 Subpart O, or burned in industrial furnaces or boilers in accordance with applicable regulatory standards: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(3)			
Were the wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, treated by carbon adsorption or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(4)			
Where the treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)			



Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	<u>      </u>	<u>      </u>	NA - not a trtmt facility
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	<u>      </u>	<u>      </u>	
Notifications and certifications:			
Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)			
(i) EPA HW ID number?	<u>      </u>	<u>      </u>	
(ii) Appropriate treatment standards and prohibitions?	<u>      </u>	<u>      </u>	
(iii) Manifest number for the waste?	<u>      </u>	<u>      </u>	
(iv) Available waste analysis data?	<u>      </u>	<u>      </u>	
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	<u>      </u>	<u>      </u>	
For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read: 268.7(b)(5)(i)	<u>      </u>	<u>      </u>	

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NA pgs. 268: 9-12  
(not a trtmt, storage, or disposal facility)

**APPENDIX B**

**NOTIFICATION OF HAZARDOUS WASTE  
ACTIVITY FORM**



7-10-68

3855 LAKEWOOD BLVD  
~~LONG BEACH, CA 90801~~

**CONTINUE ON REVERSE**

W	C	A	D	0	0	8	3	7	8	0	4	4			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE (D001)     
 ☐ 2. CORROSIVE (D002)     
 ☐ 3. REACTIVE (D003)     
 ☐ 4. TOXIC (D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME &amp; OFFICIAL TITLE (type or print)

W. BARNACK, JR.  
ENVIRONMENTAL CONTROL ENGINEER

DATE SIGNED

6/27/80

Table 1

2,000 GALLONS OR MORE PER DISPOSAL

	Concentrations	Disposed From	
		Long Beach	Torrance
<u>ACID WASTES</u>			
1. Nitric	20.0-24.0%	x	
2. Chromic	0.5-8.0 oz/gal	x	x
3. Phosphoric	5.8-8.3%	x	
4. Sulfuric	9.0-12.0%	x	x
Chromic	6.0-8.0 oz/gal		
Hydrofluoric	1.0%		
5. Nitric	8.0-10.0%	x	
Chromic	13.0-14.5 oz/gal		
Hydrofluoric	3.5-4.0%		
Sulfuric	5.0-5.5%		
6. Nitric	9.3-12.0%		x
Chromic	6.0-7.7 oz/gal		
Hydrofluoric	1.0%		
7. Chromic	3.8-4.2 oz/gal	x	x
Sodium Sulfate	0.9-1.2 oz/gal		
8. Nitric	142.0-149.0 oz/gal	x	
Hydrofluoric	80.0-102.0 oz/gal		
Butyl Cellusolve	3.0-4.0%		
9. Sulfuric	13.0-16.0%		x
Sodium Dichromate	3.5-5.0 oz/gal		
10. Nitric	7.8-15.6%	x	
Amchem 6-16	5.1-11.5 fl. oz/gal		
11. Nitric	40.0-48.0%	x	
Hydrofluoric	2.0-5.0%		
Activol	0.2%		
12. Alodine 1200	1.0-3.0 oz/gal	x	x
13. Alodine 1500	0.86-1.2%	x	
<u>CAUSTIC WASTES</u>			
1. Sodium Hydroxide	8.5-21.0 oz/gal		x
Sulfur	0.5 oz/gal (min.)		
2. Chromic Hydroxide	4.6%	x	X
Calcium Hydroxide	2.4%		
Aluminum Hydroxide	0.8%		

Table I  
2,000 GALLONS OR MORE PER DISPOSAL

Concentrations		Disposed From	
		Long Beach	Torrance
<u>CYANIDES</u>			
1. Cadmium Oxide	2.9-5.5 oz/gal	x	
Sodium Cyanide	12.0-20.0 oz/gal		
<u>ORGANICS</u>			
1. Cutting Oils	2.0%	x	x
2. Oil (Houghton #2)	100%	x	x
<u>MISCELLANEOUS SALTS</u>			
1. Potassium Dichromate	5.4-8.0 oz/gal	x	x
<u>SOLVENTS</u>			
1. Methylene Chloride	50.0%	x	
Formic Acid	<10.0%		
Phenol Cresol	<10.0%		

Table II  
LESS THAN 2,000 GALLONS PER DISPOSAL

	Concentrations	Disposed From	
		Long Beach	Torrance
<u>ACID WASTES</u>			
1. Phosphoric	2.8-4.3%	x	x
2. Hydrochloric	4.0-100.0%	x	x
3. Chromic	4.0-52.0 oz/gal	x	x
4. Nitric	1.0-55.0%	x	x
5. Sulfuric	20.0-30.0%		x
6. Chromic	13.0-53.0 oz/gal	x	x
Sulfuric	0.33-0.53 oz/gal		
7. Hydrofluoric	3.8-4.2%	x	x
Nitric	20.0-22.0%		
8. Sulfuric	9.5-13.0%	x	x
Phosphoric	57.0-61.0%		
9. Hydrofluoric	13.6%		x
Chromic	16.6 oz/gal		
10. Nitric	9.0-12.0%	x	x
Chromic	6.0-8.0 oz/gal		
Hydrofluoric	1.0%		
11. Sulfuric	66.8%	x	x
Nitric	33.0%		
Hydrochloric	0.2%		
12. Sulfuric	9.0-11.0%		x
Org. Acid (SF 166)	3.0%		
Oxalic	1.0-2.5 oz/gal		
13. Hydrochloric	34.0%		x
Rodine 50	0.39%		
14. Hydrochloric	3.0%	x	
Ferric Chloride	36.0%		
Copper Carbonate	1.35 oz/gal		
15. Sulfuric	1.0%	x	
Nacconal NR	0.1 oz/gal		
Sodium Dichromate	27.0 oz/gal		
16. Hydrochloric	32.0%	x	x
Nickel Chloride	32.0 oz/gal		

Table II  
LESS THAN 2,000 GALLONS PER DISPOSAL

	Concentrations	Disposed From	
		Long Beach	Torrance
<u>ACID WASTES</u>			
17. Hydrofluoric	2.0-5.0%	x	x
Nitric	4.0-42.0%		
Activol	0.2%		
18. Alodine 1200	1.0-3.0 oz/gal	x	x
19. Alodine 1500	0.86-1.2%	x	x
<u>CAUSTIC WASTES</u>			
1. Sodium Hydroxide	5.0 oz/gal-20.0%	x	x
2. Sodium Carbonate	6.0-8.0 oz/gal	x	
3. Sodium Carbonate	6.5 oz/gal		x
Sodium Dichromate	1.3 oz/gal		
<u>CYANIDES</u>			
1. Sodium Cyanide	4.0 oz/gal-32.0%	x	
2. Sodium Cyanide	12.0-16.0 oz/gal	x	
Cadmium Oxide	2.9-5.5 oz/gal		
3. Copper Cyanide	0.5-5.0 oz/gal	x	
Sodium Cyanide	1.0-1.25 oz/gal		
4. Cyanides (Ethone "A")	20.0-36.0 oz/gal	x	x
5. Silver Cyanide	0.4-0.6 oz/gal		x
Potassium Cyanide	8.0-10.0 oz/gal		
6. Copper Cyanide	6.35-7.05 oz/gal		x
Sodium Cyanide	1.0-1.25 oz/gal		
Rochelle Salt	4.0-8.0 oz/gal		
Sodium Carbonate	2.0-8.0 oz/gal		
Sodium Hydroxide	0.8 oz/gal		
7. Cadmium Oxide	2.9-5.5 oz/gal		x
Sodium Cyanide	12.0-16.0 oz/gal		
Sodium Carbonate	2.0-8.0 oz/gal		
Sodium Hydroxide	1.0-3.2 oz/gal		



Table II  
LESS THAN 2,000 GALLONS PER DISPOSAL

	Concentrations	Disposed From	
		Long Beach	Torrance
<u>CYANIDES</u>			
8. Silver Cyanide	3.0-6.0 oz/gal		x
Potassium Cyanide	10.0-12.0 oz/gal		
Potassium Carbonate	2.0-10.0 oz/gal		
Potassium Hydroxide	0.21 oz/gal		
<u>ORGANICS</u>			
1. Oil (Houghton #2)	100.0%	x	x
2. Hyd. Oil (Mil-H-6083)	100.0%	x	
3. Lub. Oil (Mil-C-6529)	100.0%	x	
4. EDM Oil	100.0%		x
5. Photo Resist. Dye	100.0%	x	
6. Fluorescent Penetrant	100.0%	x	x
7. Ethylene Glycol	24.0-36.0%		x
8. Kerosene	100.0%	x	x
9. Aliph. Hydrocarbons	100.0%		x
<u>MISCELLANEOUS SALTS</u>			
1. Ferric Chloride	109.0 oz/gal	x	
2. Ammonium Nitrate	16.0 oz/gal	x	x
3. Sodium Dichromate	1.2 oz/gal-18.0%	x	x
4. Irridite 1A	10.0%		x
Irridite 1B	10.0%		
5. Potassium Stannate	12.0-16.0 oz/gal		x
Potassium Hydroxide	2.0-4.0 oz/gal		

Table II

LESS THAN 2,000 GALLONS PER DISPOSAL

		Disposed From	
Concentrations		Long Beach	Torrance
<u>SOLVENTS</u>			
1. Xylene	100.0%	x	
2. Methyl Ethylketone	100.0%	x	
3. Toluene	100.0%	x	
4. Monochlorobenzene	100.0%	x	
5. Trichloroethylene	100.0%	x	x
6. Trichloro- trifluorethane	100.0%	x	
7. Stoddard Solvent	100.0%	x	x
8. Mineral Spirits	100.0%	x	x
9. Methyl Isobutylketone	17.0-19.0%	x	
10. Methyl Isoamylketone	100.0%	x	
11. Methylene Chloride	50.0%	x	x
Formic Acid	10.0%		
Phenol Cresol	10.0%		
12. Stoddard Solvent	54.0%	x	
Aromatic Naphtha	26.0%		
Methyl Isoamylketone	20.0%		

**APPENDIX C**  
**INSPECTION PHOTOGRAPHS**

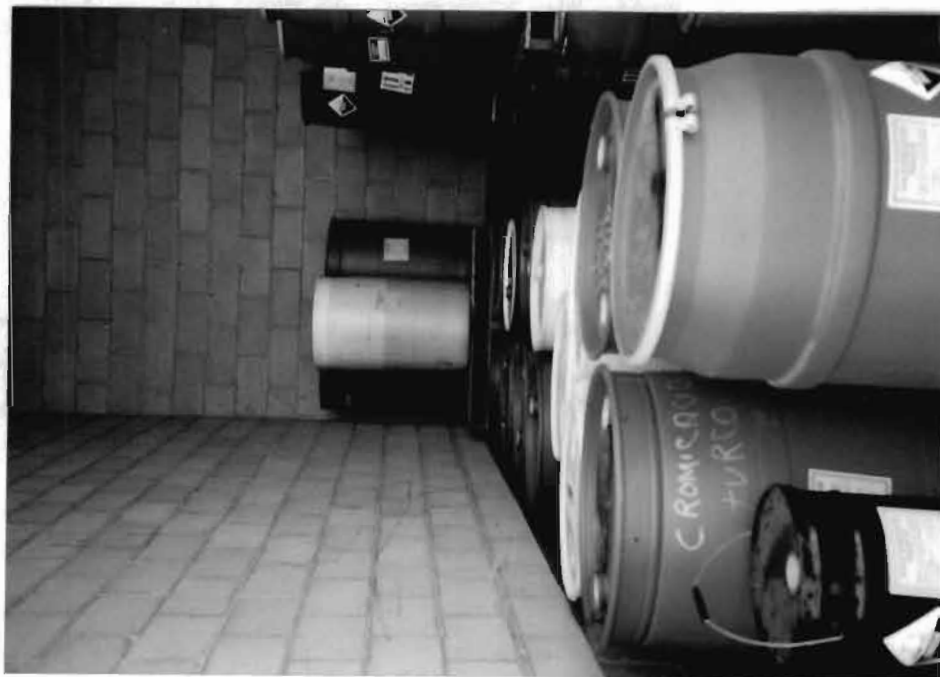


Photograph No. 1

Date: 8/21/90

Photographer: BMS

Subject: Fluorescent Penetrant Spray Booth



Photograph No. 2

Date: 8/21/90

Photographer: BMS

Subject: Acidic Wastes Bay in the Accumulation Area (Note Inadequate Aisle Space)



Photograph No. 3

Date: 8/21/90

Photographer: BMS

Subject: Acidic Wastes Bay in the Accumulation Area (Note Inadequate Aisle Space)



Photograph No. 4

Date: 8/21/90

Photographer: BMS

Subject: Flammable Wastes Bay in the Accumulation Area



Photograph No. 5

Date: 8/21/90

Photographer: BMS

Subject: Unlabeled Drum of Desmut Waste in the Accumulation Area

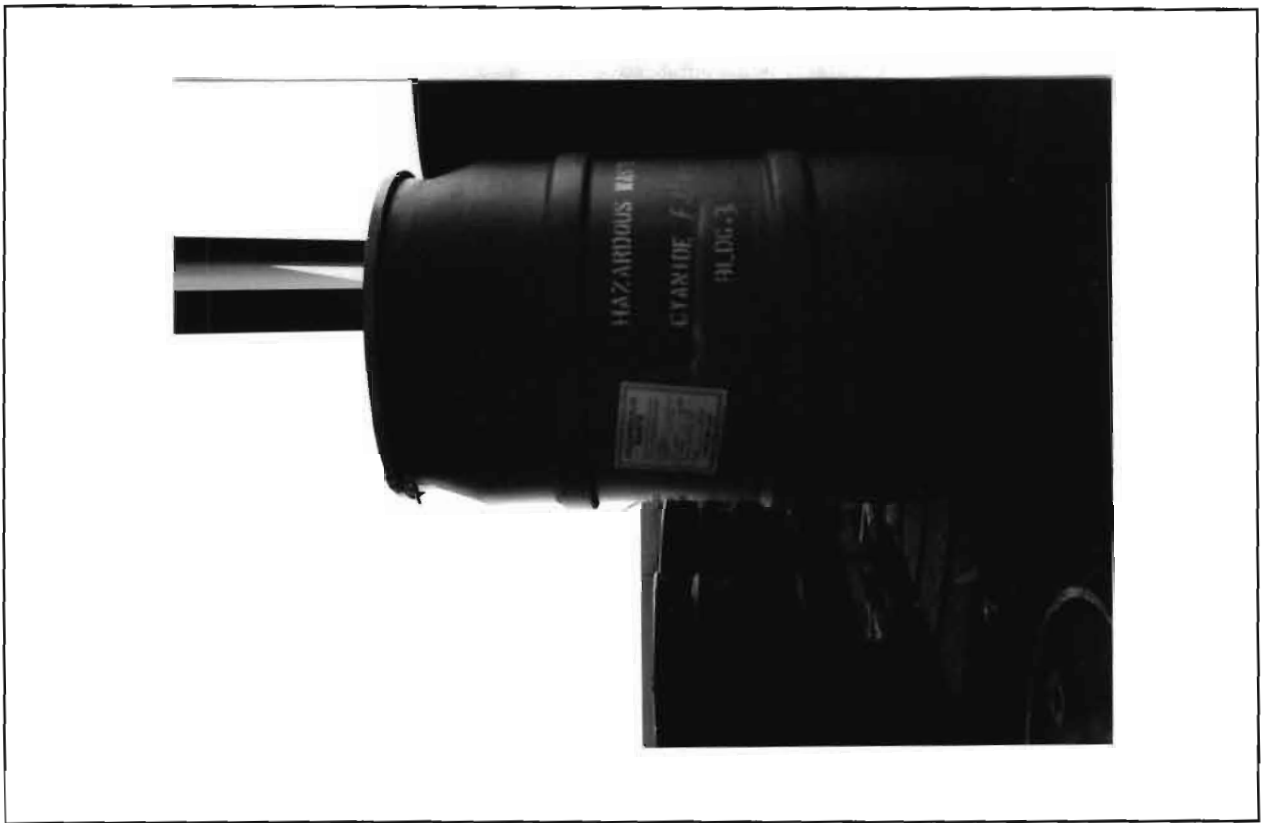


Photograph No. 6

Date: 8/21/90

Photographer: BMS

Subject: Unlabeled Drum of Desmut Waste in the Accumulation Area



Photograph No. 7

Date: 8/21/90

Photographer: BMS

Subject: Drum of Cyanide Filters Marked as Hazardous Waste

**APPENDIX D**  
**FLUORESCENT PENETRANT MSDS**



## MATERIAL SAFETY DATA SHEET

MAR 5 1990

PRODUCT NAME: TRACER TECH P-133D

ARDROX INC.  
16961 Knott Avenue La Mirada, CA 9063

(714) 739-2821

CHEMTREC EMERGENCY TELEPHONE: 800-424-9300

EFFECTIVE DATE: 01 FEB 1990

## I. HAZARDOUS INGREDIENTS:

COMPONENT(S):	WT %	EXPOSURE LIMITS TO AIR		OSHA PEL
		CAS NO.	ACGIH TLV	
Hydrotreated Middle Distillate	*	8042-47-5	ND	ND
Alkyloxypolyethylenoxy ethanol	*	68131-40-8	ND	ND
Alkyl Phenol Ethoxylate	*	9016-45-9	ND	ND

\*Not listed as Toxic Chemical on SARA TITLE III; Section 313, Toxic Chemical List; therefore, disclosure of weight percent information is not required.

Where applicable, PEL values listed are TWA Final Rule Limits 1989. If no Final Rule Limit exists, the Transitional Rule Limit is listed.

## II. PHYSICAL DATA:

MELTING POINT: ND	SPECIFIC GRAVITY: 0.871
BOILING Point: Over 240°F	SOLUBILITY IN WATER: Moderate
VAPOR PRESSURE (mm Hg): ND	EVAPORATION RATE(BuAc=1): <1
VAPOR DENSITY (Air=1): ND	PH: NA
ODOR: Mild odor.	
APPEARANCE: Fluorescent yellow green mobile liquid.	

## III. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: >200°F  
METHOD USED: P.M.C.C.  
AUTOIGNITION TEMPERATURE: 428°F  
FLAMMABLE LIMITS: UPPER: 6.0 LOWER: 1.1  
EXTINGUISHING MEDIA: Dry Chemical. Foam. CO2.

## FIRE AND EXPLOSION HAZARDS:

Dense smoke may be generated while burning. Carbon monoxide, carbon dioxide, and other oxides may be generated as products of combustion.

## SPECIAL FIRE FIGHTING PROCEDURES:

# MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRACER TECH P-133D

ARDROX INC.  
16961 Knott Avenue La Mirada, CA 906

(714) 739-2821

Water may be ineffective but can be used to cool containers exposed to heat or flame. Caution should be exercised when using water or foam as frothing may occur, especially if sprayed into containers if hot, burning liquid.

## IV. REACTIVITY:

STABILITY: Stable  
CONDITIONS TO AVOID:  
Stable under normal storage conditions.

HAZARDOUS POLYMERIZATION:  
Will Not Occur

INCOMPATIBILITY:  
Strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:  
Carbon monoxide and carbon dioxide on combustion.

## V. ENVIRONMENTAL AND DISPOSAL INFORMATION:

### ACTION TO TAKE FOR SPILLS/LEAKS

CAUTION:  
Use appropriate protective and safety equipment. See Section VIII of this Material Safety Data Sheet for handling precautions.

SMALL SPILL:  
Mop up or soak up with non-combustible absorbent inorganic material. Transfer to DOT-approved container.

LARGE SPILL:  
Contain by diking with non-combustible absorbent inorganic material. Prevent runoff from entering sewers, storm drains, surface water, and soil. Transfer contaminated absorbent to a DOT-approved container.

WASTE DISPOSAL INFORMATION:  
Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

NOTE:  
Comply with all applicable government regulations on spill reporting and handling and disposal of waste. Empty containers can have residues, gases, and mists, and are subject to proper waste disposal.

## VI. HEALTH HAZARD DATA:

# MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRACER TECH P-133D

ARDROX INC.  
16961 Knott Avenue La Mirada, CA 90638

(714) 739-2821

## BREATHED:

This product has a low vapor pressure and is not expected to present an inhalation hazard at ambient conditions. If misted, and concentrations are kept below TLV, product is without significant health risk. Acute overexposure may result in irritation of the throat and lungs. Chronic exposure to high concentrations of aerosols or mists to laboratory animals has resulted in non-specific symptoms related to the NERVOUS SYSTEM, GASTROINTESTINAL TRACT, and LUNGS.

## SKIN CONTACT:

Avoid skin contact. This product may cause moderate skin irritation upon direct contact. Single contact with this product may cause dermatitis. Prolonged or repeated contact may result in contact dermatitis which is characterized by dryness, chapping, and reddening. This condition may make the skin more susceptible to other irritants, sensitizers, and disease. Pre-existing skin conditions may make the skin more susceptible and facilitate uptake by this route..

## SKIN ABSORPTION:

Prolonged or widespread contact with skin may lead to absorption of harmful amounts of material with accompanying signs and symptoms of toxicity as described for other categories in this section.

## EYE CONTACT:

Avoid eye contact. This product may be slightly irritating to the eyes upon direct contact. This product has a low vapor pressure and is not expected to present a hazard to the eyes at ambient conditions. Exposure to high concentrations of vapors may be irritating to the eyes.

## SWALLOWED:

Do not ingest. Ingestion of small quantities is usually nonfatal unless aspiration occurs. Severe oral intoxication will lead to intense burning of the throat and may result in drowsiness, dullness, numbness, and headache followed by dizziness, weakness and nausea, loss of consciousness and convulsions followed by death.

## SYSTEMIC AND OTHER EFFECTS:

Aspiration may lead to chemical pneumonitis which is characterized by pulmonary edema and hemorrhage, and may be fatal. Signs of lung involvement include increased respiration rate, increased heart rate, and a bluish discoloration of the skin. Coughing choking, and gagging are often noted at the time of aspiration. Gastrointestinal discomfort may develop, followed by vomiting, with a further risk of aspiration.

## MEDICAL CONDITIONS AGGRAVATED:

# MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRACER TECH P-133D

ARDROX INC.  
16961 Knott Avenue La Mirada, CA 90638

(714) 739-2821

Persons with pre-existing skin conditions may be susceptible to the effects of a component(s) of this product.

## SUSPECTED CANCER AGENT:

FEDERAL OSHA  
No

CA OSHA  
No

NTP  
No

IARC  
No

TARGET ORGANS, OTHER THAN THOSE IMPLIED BY ROUTES OF ENTRY (I.E., BREATHED, INCLUDES RESPIRATORY TRACT AND LUNGS) ARE CAPITALIZED. This product DOES NOT contain chemicals known to the State of California to cause cancer or reproductive toxicity.

## VII. FIRST AID:

### BREATHED:

Remove victim to fresh air at once. If not breathing, give mouth-to-mouth resuscitation. If breathing is difficult, give oxygen. Keep victim warm and at rest. GET IMMEDIATE MEDICAL ATTENTION.

### SKIN:

Wash skin immediately with lots of soap and water. If clothes and shoes are contaminated, remove and wash before reuse. Get medical attention if ill effect or irritation develops.

### EYES:

Wash eyes immediately with running water for at least 15 minutes. Use fingers to assure that eyelids are separated and that eye is being washed. Lift the lower and upper lid occasionally. GET IMMEDIATE MEDICAL ATTENTION.

### SWALLOWED:

DO NOT INDUCE VOMITING. If victim is conscious, give large amounts of water. Do not attempt to give fluids to unconscious victim. GET MEDICAL ATTENTION.

### NOTE TO PHYSICIAN:

Supportive care: Treatment based on judgement of physician in response to reactions of patient.

## VIII. HANDLING PRECAUTIONS:

### VENTILATION:

Control airborne concentrations below exposure guidelines (Section I) with MECHANICAL VENTILATION, if necessary. Local explosion-proof EXHAUST VENTILATION may be necessary for some operations.

# MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRACER TECH P-133D

ARDROX INC.  
16961 Knott Avenue La Mirada, CA 90638

(714) 739-2821

## RESPIRATORY PROTECTION:

Atmospheric levels should be maintained below exposure guidelines. When respiratory protection is required for certain operations, use a NIOSH-approved cannister-type respirator. In confined or poorly ventilated areas or for emergency and other conditions where the exposure guidelines may be greatly exceeded, use an approved positive-pressure, self-contained breathing apparatus.

## EYE PROTECTION:

Contact lenses should not be used. Suggested protection is safety glasses, but where contact with liquid is likely, chemical goggles or face shields are recommended.

## SKIN PROTECTION:

Impermeable gloves are recommended. When prolonged or frequently repeated contact could occur, use protective clothing. Selection of specific items such as boots, apron, or full-body suit will depend on operation. Wash thoroughly after handling chemicals.

## SPECIAL EQUIPMENT:

Suitable laboratory safety equipment includes safety showers, eye washes, and proper fire extinguishing media.

## X. STORAGE AND HANDLING:

Train all employees on all special handling procedures in this section before they work with this product. Exercise reasonable care and caution. Personnel should avoid breathing vapors and/or mists and getting product in the eyes or on the skin. DO NOT CONSUME food, drink, or tobacco in areas where they may become contaminated with this material. Keep containers cool, dry, and away from sources of ignition. DO NOT STORE product in direct sunlight, high temperature, or below freezing areas. Keep product container tightly closed when not in use. Protect containers from physical damage. Use and store with adequate ventilation. DO NOT cut, grind, weld or drill on or near this container. Ground all equipment. Wash thoroughly after using.

## II. DOT:

PROPER SHIPPING NAME: NON-REGULATED  
HAZARD CLASS: NON-HAZARDOUS BY CFR 49 172.101  
ID NUMBER: NONE

## I. OTHER PRECAUTIONS:

None Abbreviations: NA: Not Applicable; ND: Not Determined.

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRACER TECH P-133D

ARDROX INC.  
16961 Knott Avenue La Mirada, CA 90638

(714) 739-2821

THE INFORMATION HEREIN IS GIVEN IN GOOD FAITH, BUT NO WARRANTY, EXPRESS OR IMPLIED, IS MADE. FOR FURTHER INFORMATION, CALL (714) 739-2821.  
DATE PREPARED: 18DEC89

III. NAME OF PREPARER:

  
Sheree L. Kinzel

**APPENDIX E**  
**TANK INSTALLATION REPORT**

# **TANK INSTALLATION REPORT**

## **DOUGLAS AIRCRAFT COMPANY**

**P.O. BOX 200  
LONG BEACH, CALIFORNIA**

**APRIL 1990**

Submitted to:

Mr. Larry Burik  
McDonnell Douglas Corporation  
Douglas Aircraft Company  
P.O. Box 200  
Long Beach, California 90846-0001

Prepared by:

EMCON Associates  
120 Columbia, Suite 500  
Aliso Viejo, California 92656

Project C34-01.01



## 1.0 SYSTEM CERTIFICATION

EMCON believes that the system design and installation meets the recommended guidelines of 40 CFR 265-192. Specifically, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information and imprisonment for knowing violations.



R. S. Limaye  
Ravi Limaye, P.E.  
Manager of Engineering

## 2.0 INTRODUCTION

This report describes the installation of two underground 4,915 gallon liquid accumulation tanks and monitoring systems at the Douglas Aircraft Company facility in Long Beach. EMCON was selected by the Douglas Aircraft Company to manage all aspects of the installation work in a fixed price (lump sum) job. EMCON selected Disposal Control Service, Inc., a California licensed contractor to do the installation and provided overall project management. The installation work was carried out per details outlined in Douglas Aircraft Company's specification No. 2404, dated November 29, 1988 with exceptions outlined in EMCON's January 27, 1989 letter to the Douglas Aircraft Company.

The primary function of the tanks is for the accumulation of waste jet fuel and waste mixed solvents. No product piping or dispensers were associated with this installation. Vacuum trucks will be used to empty the tanks when filled to 90% of capacity.

A tank installation report was prepared by EMCON and was submitted to the Douglas Aircraft Company in October, 1989. At the time, all the construction activities except for the installation of a tank liquid level monitoring system were complete. Unfortunately, the tank liquid level monitoring manufacturer could not supply the specified system. A search for a suitable alternate system was completed and the monitoring system was purchased after receiving authorization from the Douglas Aircraft Company. This report provides details of the new system and also provides as-built specifications and drawings of the installation of the underground tanks.

## 3.0 TANK AND PIPING INSTALLATION

On August 15, 1989 two double wall 4,915 gallon liquid accumulation tanks were installed. The tanks were placed on approximately 12 inches of 1/2 inch crushed rock. The crushed rock was graded to provide approximately 2 inches of drop from the north end to the south end (fill end) of the tanks. A transit was used to provide accuracy. Tank #1, the eastern tank and Tank #2, the western tank, showed U.L. numbers of J362151 and J362152, respectively.

During excavation, no ground water or contaminated soil was encountered. All excavated soil was hauled offsite for disposal.

Piping for vent lines, fill pipes and stand pipes for liquid level monitoring probes was installed on August 17, 1989. The 2-inch diameter Schedule 40 steel vent pipes were installed with two swing joints per vent as required by the City of Long Beach Fire Code. The swing joints are required to compensate for possible seismic activity. Conduit was installed for the interstitial space monitoring probes. All below grade piping was wrapped with 20 ml plastic polymer tape.

Fiberglass man-holes were installed on the fill end of each tank on August 18, 1989. Sheet metal conduit was placed above the tanks for interstitial monitoring probe access and vent pipe up-rights were installed along the fence to a height of 12 feet above grade.

The remainder of the excavation was filled with 1/2 inch crushed rock to within two feet of grade. Typar fabric was placed above the crushed rock followed by approximately 18 inches of native backfill. The backfill was compacted to achieve approximately 90% density. Over the native backfill was placed six inches of concrete reinforced with 6" x 6" sections of 10 gage thick wire mesh. Attached drawings (Figure 1 and Figure 2) show additional installation details.

#### 4.0 MONITORING SYSTEMS

Veeder-Root interstitial monitoring probes were installed in both tanks on September 13, 1989. The monitoring probes satisfy City of Long Beach Fire Department regulations requiring that the secondary container be tested daily for leakage from the primary container. The system is capable of distinguishing between tank leak, water leak and problems with the sensor.

An optional tank liquid level monitoring system was requested for each tank by Douglas Aircraft Company. The selected monitoring system by Ronan Engineering Company is designed to provide precision liquid level measurement, fingertip inventory management control, monitor the tanks for leakage and also alert the Douglas Aircraft Company when tanks fill to 90% of the capacity. The

operation of the system was checked by the manufacturer's representative on March 26, 1990.

Both monitoring systems are connected to audible alarm and LED display control boxes mounted together on the surface in an all-weather box.

## 5.0 SITE INSPECTIONS

August 15, 1989: Fire Department inspection and approval of Holiday Test on both tanks.

August 16, 1989: Fire Department inspection and approval of tank and interstitial space pressure test. Tanks were pressure tested with air for 15 minutes at 4 psi.

October 22, 1989: Fire Department inspection and approval of tank leak detection system.

## 6.0 EQUIPMENT/INSTRUMENT SPECIFICATIONS

Liquid Accumulation Tank, T-1 and T-2

- o U.L. Type I Secondary Containment Tank, Glasteel
- o 97" O.D. x 13' 9" long
- o 4,915 gallon capacity
- o 36" diameter manway
- o 4" diameter fill, 2" vent connection

Supplier: Modern Welding Company, Inc.

## Tank Level Monitoring System

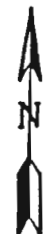
- o RONAN Model X76E7M
- o Data Entry/Command Module 950413-1

Supplier: Ronan Engineering Company

## Interstitial Leak Probe

- o Model ILS-250
- o 1/16" precision
- o Audible and visual leak detect indicators

Supplier: Veeder Root, Inc.



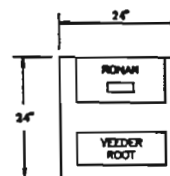
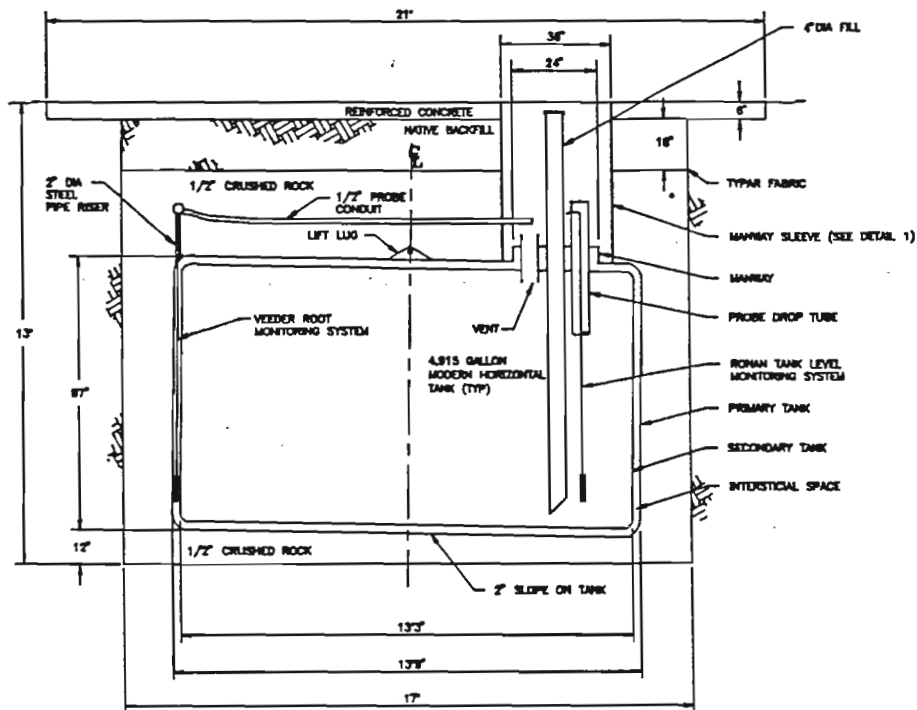
**EMCON**  
**Associates**

## SITE PLAN

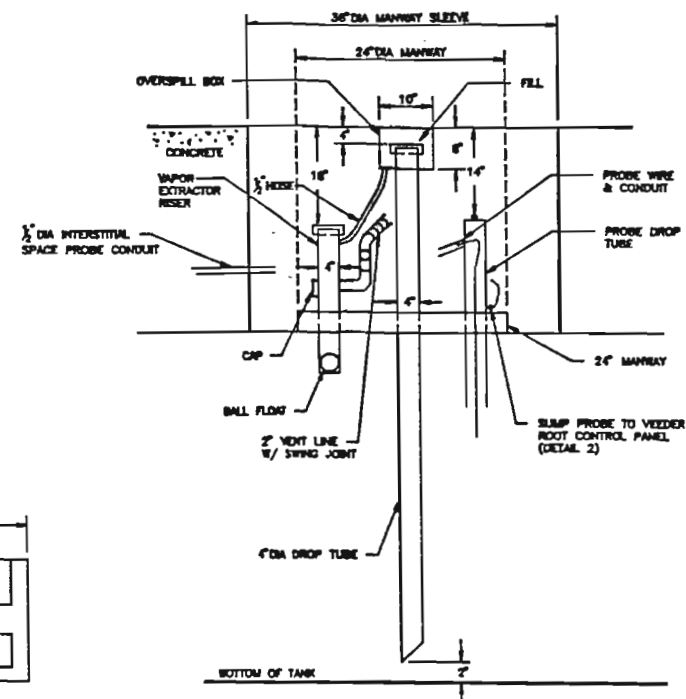
1

PROJECT NO.

034 01 01



DETAIL 2



DETAIL 1



**Emcon**  
Associates

NOT TO SCALE

McDONNELL DOUGLAS CORPORATION  
3855 LAKEWOOD BOULEVARD  
LONG BEACH, CALIFORNIA

CROSS SECTION & DETAILS

FIGURE

**2**

PROJECT NO.  
C34-01.01

NO. TIN- 001004

ACCT. NO. 3037

PROPERTY OWNER MCDONALD DOUGLAS AIRCRAFT Co. PHONE \_\_\_\_\_  
ADDRESS 3855 LAKEWOOD BLVD. LONG BEACH Ca  
FACILITY NAME SAME PHONE \_\_\_\_\_  
FACILITY ADDRESS SAME  
TYPE OF BUSINESS AIRCRAFT OCC. CLASS \_\_\_\_\_  
OPERATOR/TENANT/SUPERVISOR SAME RES. PHONE \_\_\_\_\_  
RES. ADDRESS \_\_\_\_\_  
24-HR. EMERGENCY CONTACT PERSON DAYS \_\_\_\_\_ PHONE \_\_\_\_\_  
NIGHTS \_\_\_\_\_ PHONE \_\_\_\_\_  
TOTAL NO. OF EXISTING TANKS  
(1) ABOVE GRND \_\_\_\_\_ (2) UNDER GRND 2 LAST/PRIOR INSTALLATION PERMIT NO. 20554  
TOTAL CAP. OF EXISTING TANKS  
(1) ABOVE GRND \_\_\_\_\_ (2) UNDER GRND \_\_\_\_\_  
(1) MONITORED YES \_\_\_\_\_ NO \_\_\_\_\_ (2) MONITORED YES \_\_\_\_\_ NO \_\_\_\_\_

NEW TANK INSTALLATION INFORMATION

INSTALLATION CONTRACTOR DISPOSAL CONTROL SERVICE CITY BUS. LIC. NO. 893916  
ADDRESS 1369 W 9TH ST. UPLAND Ca 91786 PHONE 714-983-0342

TANK(S) UL NO.	#1	#2	#3	#4
TANK CAPACITY	<u>5000 K</u>	<u>5000 K</u>		
COMMODITY NAME				
HAZARD RATING				
CAS NO.				
TANK MFG.	<u>MODERN</u>	<u>MODERN</u>		
YEAR OF MFG.	<u>1989</u>	<u>1989</u>		
THICKNESS OF PRIMARY TANK	<u>3/4"</u>	<u>3/4"</u>		
TANK CONST. MATERIAL	<u>STEEL</u>	<u>STEEL</u>		
TYPE OF TANK LINING	<u>STEEL</u>	<u>STEEL</u>		
TYPE OF OUTER TANK COATING	<u>PLASTIC</u>	<u>PLASTIC</u>		
ASSOC. PIPING	ABOVE GRND _____	UNDER GRND _____	VAULTED _____	
	GRAVITY <input checked="" type="checkbox"/>	PRESSURE _____	SUCTION _____	
	TYPE OF SECONDARY CONTAINMENT <u>MANWAYS WILL BE CONTAINED.</u>			

TYPE OF MONITORING SYSTEM \_\_\_\_\_  
TANK(S) VEEDER ROOT MONITORING SYSTEM  
PIPING ELECTRICIAN ONLY  
STORED PRODUCT TO BE USED IN CONNECTION WITH \_\_\_\_\_

I, THE UNDERSIGNED, HAVE READ COMPLETELY AND FULLY UNDERSTAND THE LONG BEACH FIRE DEPARTMENT REQUIREMENTS ON THE REVERSE SIDE WHICH APPLY TO THIS APPLICATION AND PERMIT. I, THE UNDERSIGNED, ATTEST TO THE BEST OF MY KNOWLEDGE, UNDER THE PENALTY OF PERJURY, THAT THE ABOVE PROVIDED INFORMATION IS TRUE AND CORRECT. I, THE UNDERSIGNED, ACCEPT THE CONDITION THAT ANY DEVIATION(S) FROM AND/OR MISINFORMATION ON THIS FORM WILL RENDER THIS APPLICATION AND PERMIT NULL AND VOID.

APPLICANT SIGNATURE Kevin Keller DATE 7/20/89  
PRINTED NAME KEVIN KELLER TITLE MANAGER PHONE 714-983-0342  
APPLICATION APPROVED ☒ DENIED ☐ BY Richard W. McIntyre DATE 7/20/89  
L.B.F.D. Fire Prevention Officer

INSTALLATION INSPECTIONS

HOLIDAY TEST DATE 8/15/89 BY R.W. McIntyre PIPING N/A  
TANK(S) 2  
TANK LEAK DETEC. SYSTEM VEEDER ROOT MONITORING  
VENTILATION N/A JUL 20 1989 VAPOR RECOVERY SYSTEM \_\_\_\_\_  
POST IN CONSPICUOUS LOCATION Installed. (1/2)  
BUREAU OF FIRE PREVENTION  
COPY DISTRIBUTION  
WHITE: L.B.F.D. Bureau of Fire Prevention  
GREEN: L.B.H.D. Hazardous Materials Unit  
CANARY: extra copy  
PINK: applicant's copy  
BUREAU OF FIRE PREVENTION  
OWNER'S COPY  
FR 20 (8/1/85)

TYPE OR USE BLACK INK ONLY



